



# FY 2014 Office of Head Start Monitoring Protocol

**September 27, 2013**



# Table of Contents

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<b>FY 2014 OHS Monitoring Protocol.....</b>	<b>1</b>
<i>Overview .....</i>	<i>1</i>
<b>Program Governance Introduction .....</b>	<b>3</b>
<b>Program Governance .....</b>	<b>4</b>
<i>Program Governance Key Indicator #1—Structure and Participation .....</i>	<i>4</i>
<i>Program Governance Key Indicator #2—Roles, Responsibilities, and Training .....</i>	<i>6</i>
<i>Program Governance Key Indicator #3—Reporting to Governing Body and Policy Council.....</i>	<i>10</i>
<b>Management Systems Introduction .....</b>	<b>12</b>
<b>Management Systems .....</b>	<b>14</b>
<i>Management Systems Key Indicator #1—Program Planning .....</i>	<i>14</i>
<i>Management Systems Key Indicator #2—Ongoing Monitoring .....</i>	<i>16</i>
<i>Management Systems Key Indicator #3—Human Resources .....</i>	<i>18</i>
<i>Management Systems Key Indicator #4—Communication.....</i>	<i>21</i>
<i>Management Systems Key Indicator #5—Record Keeping and Reporting .....</i>	<i>22</i>
<i>Management Systems Key Indicator #6—Strengths and Summaries.....</i>	<i>24</i>
<b>Fiscal Integrity Introduction .....</b>	<b>28</b>
<b>Fiscal Integrity .....</b>	<b>30</b>
<i>Fiscal Integrity Key Indicator #1—Financial Management Systems .....</i>	<i>30</i>
<i>Fiscal Integrity Key Indicator #2—Reporting.....</i>	<i>35</i>
<i>Fiscal Integrity Key Indicator #3—Procurement.....</i>	<i>37</i>
<i>Fiscal Integrity Key Indicator #4—Compensation .....</i>	<i>39</i>
<i>Fiscal Integrity Key Indicator #5—Cost Principles .....</i>	<i>44</i>
<i>Fiscal Integrity Key Indicator #6—Facilities and Property.....</i>	<i>50</i>



<b>ERSEA Introduction .....</b>	<b>57</b>
<b>ERSEA .....</b>	<b>58</b>
<i>ERSEA Key Indicator #1—Recruitment and Selection.....</i>	<i>58</i>
<i>ERSEA Key Indicator #2—Eligibility .....</i>	<i>60</i>
<i>ERSEA Key Indicator #3—Enrollment .....</i>	<i>63</i>
<i>ERSEA Key Indicator #4—Attendance and Participation .....</i>	<i>65</i>
<b>Child Health &amp; Safety Introduction .....</b>	<b>67</b>
<b>Child Health &amp; Safety.....</b>	<b>68</b>
<i>Child Health &amp; Safety Key Indicator #1—Access to Health and Dental Care .....</i>	<i>68</i>
<i>Child Health &amp; Safety Key Indicator #2—Screening and Referrals.....</i>	<i>73</i>
<i>Child Health &amp; Safety Key Indicator #3—Safe Physical Environments.....</i>	<i>76</i>
<i>Child Health &amp; Safety Key Indicator #4—Healthy Practices and Routines.....</i>	<i>80</i>
<i>Child Health &amp; Safety Key Indicator #5—Appropriate Group Sizes and Supervision .....</i>	<i>84</i>
<i>Child Health &amp; Safety Key Indicator #6—Safe Transportation.....</i>	<i>87</i>
<b>Family &amp; Community Engagement Introduction .....</b>	<b>91</b>
<b>Family &amp; Community Engagement .....</b>	<b>92</b>
<i>Family &amp; Community Engagement Key Indicator #1—Partnerships with Families .....</i>	<i>92</i>
<i>Family &amp; Community Engagement Key Indicator #2—Parent-Child Relationships .....</i>	<i>94</i>
<i>Family &amp; Community Engagement Key Indicator #3—Parents as Their Child’s Educators.....</i>	<i>97</i>
<i>Family &amp; Community Engagement Key Indicator #4—Parents in Transitions.....</i>	<i>100</i>
<i>Family &amp; Community Engagement Key Indicator #5—Community Partnerships .....</i>	<i>102</i>
<b>Child Development and Education Introduction .....</b>	<b>105</b>
<b>Child Development and Education .....</b>	<b>106</b>
<i>Child Development &amp; Education Key Indicator #1- School Readiness.....</i>	<i>106</i>
<i>Child Development &amp; Education Key Indicator #2- Curriculum Selection and Implementation.....</i>	<i>109</i>
<i>Child Development &amp; Education Key Indicator #3—Individualizing.....</i>	<i>111</i>
<i>Child Development &amp; Education Key Indicator #4—Quality Teaching and Learning.....</i>	<i>114</i>



# FY 2014 OHS Monitoring Protocol

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## Overview

The Office of Head Start (OHS) presents the FY 2014 Monitoring Protocol; this instrument is used to gather data during on-site monitoring reviews. The protocol measures seven (7) areas of grantee performance and contains key indicators that are used to assess each grantee. Data gathered about grantees during monitoring reviews is used by the Office of Head Start to evaluate multiple levels of performance, including determining program strengths, concerns, noncompliances, and deficiencies.

The Protocol organizes selected program Performance Standards, the Head Start Act, and fiscal regulations into seven (7) content areas:

- 1) Program Governance (GOV)
- 2) Management Systems (SYS)
- 3) Fiscal Integrity (FIS)
- 4) Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA)
- 5) Child Health and Safety (CHS)
- 6) Family and Community Engagement (FCE)
- 7) Child Development and Education (CDE)

## *Organization of the Protocol*

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### **Key Indicators & Compliance Measures**

Each of the seven (7) content areas contains Key Indicators of Program Performance, simply called **Key Indicators**. Each Key Indicator contains a series of Compliance Measures (CM). The Compliance Measures are the specific statements that collectively assess the level of program performance for each Key Indicator, focusing on one or more Federal regulations critical to the delivery of quality services and the development of strong management systems.

### **Targeted Questions**

Targeted Questions (TQ) for each compliance measure are designed to provide guidance to on-site reviewers and to ensure a standardize method for evidence collection. Reviewers are required to answer all Targeted Questions for each Compliance Measure. The Targeted Questions indicate the people to interview, questions to ask, information to retrieve from documents, observations to conduct, and management systems to analyze in order to determine the level of grantee performance for each Key Indicator.

### **Guides**

As in previous years, the Protocol also contains organizing tools called Guides. In the OHSMS Software the Guides align the Targeted Questions with the way reviewers collect information in the field. Guides pull together all of the Targeted Questions related to a particular method and source of evidence



collection (e.g. Health Coordinator Interview). The responses to each Targeted Question in a Guide are linked to the appropriate Key Indicator and Compliance Measure.

In FY 2014, the following guides are used by Reviewers:

- Interviews
- Documents
- Observations
- Child Files
- Staff Files

In the OHSMS Software the Guides and Protocol can be customized to reflect the type of program being reviewed (e.g., center-based, family child care, home-based, migrant), and the types of children or populations being served by the program (e.g., infants and toddlers, preschool-age children, pregnant women and new mothers). When targeted questions only apply to a specific program option or population, an “Applies To” marker will be located below the question (e.g., APPLIES TO: Center-based programs).



## Program Governance Introduction

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**Program Governance (GOV)** is designed to assess the level in which grantees implement governance practices that ensure effective oversight of program operations by the governing body and active participation in decision-making by the Policy Council. Head Start programs must ensure that governing board and Policy Council are composed of the required members. Members of both groups must receive training necessary to fulfill their responsibilities, including the opportunity to analyze reports designed to inform decisions regarding program planning, assessment, design, and overall operations. By monitoring Program Governance, the OHS is better able to ensure that programs establish practices to ensure effective oversight and informed decision-making.

### Key Indicators of Program Performance

#### *Structure and Participation*

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The program has the required structure and process in place to promote full participation of the governing body and Policy Council.

#### *Roles, Responsibilities, and Training*

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The governing body and Policy Council fulfill all of their responsibilities to ensure the effective oversight of the program.

#### *Reporting to Governing Body and Policy Council*

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The program provides all of the required reports to the governing body and Policy Council to ensure they have the necessary information to make decisions and provide effective oversight of the program.



## Program Governance

### Program Governance Key Indicator #1—Structure and Participation

*The program has the required structure and process in place to promote full participation of the governing body and the Policy Council.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
1.1	<p>The program has a governing body composed of:</p> <ul style="list-style-type: none"> <li>• At least 1 member with background and expertise in accounting or Fiscal management</li> <li>• At least 1 member with background and expertise in Early Childhood Education and Development</li> <li>• At least 1 member who is a licensed attorney familiar with the issues that come before the governing body</li> <li>• Additional members who reflect the community, including parents of formerly or currently enrolled Head Start/Early Head Start children</li> <li>• Other members selected for their expertise in education, business administration, or community affairs</li> </ul> <p>If no individual meets the qualifications of Fiscal Management/Accounting or Early Childhood Education and Development expertise or is a licensed attorney, the program is to use a consultant or other individual with relevant expertise and qualifications.</p>	<p>642(c)(1)(B)(i) 642(c)(1)(B)(ii) 642(c)(1)(B)(iii) 642(c)(1)(B)(iv) 642(c)(1)(B)(vi)</p>
1.2	<p>The program has established a Policy Council elected by parents of currently enrolled children, whose membership is composed of a majority of parents of children currently enrolled in the program as well as members of the community served by the Head Start agency.</p> <p><i>Note: Applies to grantees only</i></p>	<p>642(c)(2)(B)(i) 642(c)(2)(B)(ii)(I) 642(c)(2)(B)(ii)(II)</p>

### Targeted Questions

#### Governing Body—Interview

- ▶ Ask the governing body to describe the composition of its membership and share documentation that confirms membership and oversight responsibilities for each of the required content areas. Does the governing body have all of the following?
  - At least 1 member with Fiscal/accounting background and expertise
  - At least 1 member with early childhood education and development background and expertise
  - At least 1 member who is a licensed attorney



- Members who reflect the community served, including parents of children who are currently or were formerly enrolled in Head Start programs

If the composition of the governing body does not include individuals with the required qualifications, describe whether the program uses consultants or other individuals with relevant expertise and qualifications.

GOV1.1

## Targeted Questions

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### Policy Council—Interview

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- ▶ Ask the Policy Council to describe the composition of its membership and share relevant documentation that confirms that the Policy Council has the appropriate composition and members are elected.

Does the Policy Council membership meet the following requirements?

- At least 51 percent of the members are parents of children currently enrolled in the Head Start program (including delegate agencies).
- At least one member is from the at-large community served by the program or any delegate agency.
- Members are elected by parents of children currently enrolled in the program.

Ask the program to provide the documents needed and review them with you to confirm the Policy Council's membership.

GOV1.2



## Program Governance Key Indicator #2—Roles, Responsibilities, and Training

*The governing body and the Policy Council fulfill all their responsibilities to ensure the effective oversight of the program.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
2.1	<p>Members of the governing body and the Policy Council receive appropriate training and technical assistance to ensure that they understand the information they receive and can provide effective oversight of, make appropriate decisions for, and participate in programs of the Head Start agency.</p> <p><i>Note: Applies to grantees only</i></p>	642(d)(3)
2.2	<p>The governing body is responsible for required activities and makes decisions pertaining to program administration and operations, including selecting delegates and service areas; establishing procedures and criteria for recruitment, selection, and enrollment; reviewing all applications for funding; and establishing procedures for selecting Policy Council members.</p>	<p>642(c)(1)(E)(iv)(I)                      642(c)(1)(E)(iv)(II)                      642(c)(1)(E)(iv)(III)                      642(c)(1)(E)(iv)(VI)</p>
2.3	<p>The governing body exercises Fiscal and legal responsibility and oversight and reviews and approves all major program policies.</p>	<p>642(c)(1)(E)(iv)(V)(aa)                      642(c)(1)(E)(iv)(V)(bb)                      642(c)(1)(E)(iv)(V)(cc)                      642(c)(1)(E)(iv)(VII)(aa)                      642(c)(1)(E)(iv)(VII)(bb)                      642(c)(1)(E)(iv)(VII)(cc)                      642(c)(1)(E)(iv)(VII)(dd)                      642(c)(1)(E)(iv)(VIII)                      642(c)(1)(E)(iv)(IX)</p>
2.4	<p>The Policy Council approves and submits decisions about identified program activities to the governing body.</p> <p><i>Note: Applies to grantees only</i></p>	<p>642(c)(2)(A)                      642(c)(2)(D)(i)                      642(c)(2)(D)(ii)                      642(c)(2)(D)(iii)                      642(c)(2)(D)(iv)                      642(c)(2)(D)(v)                      642(c)(2)(D)(vi)                      642(c)(2)(D)(vii)                      642(c)(2)(D)(viii)</p>



## Targeted Questions

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### Policy Council—Interview

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- ▶ Ask the program to provide you with documentation of Policy Council training, (e.g., Policy Council meeting agendas and minutes), which you will review with staff while discussing this item.

Ask the Policy Council to describe the training they received and provide examples of how the training has helped them make decisions about the Head Start program.

GOV2.1

### Governing Body—Interview

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- ▶ Ask the program to provide you with documentation of governing body training, (e.g., governing body meeting agendas and minutes), which you will review with staff while discussing this item.

Ask the governing body to describe the training received and provide examples of how the training has helped them make decisions about the Head Start program.

GOV2.1

## Targeted Questions

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### Governing Body—Interview

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- ▶ Ask the governing body to explain their role in program planning and to provide specific examples. Did the governing body play a role in:
  - Establishing procedures and criteria for recruiting, selecting, and enrolling children
  - Selecting delegate agencies, as appropriate
  - Developing procedures for selecting Policy Council members
  - Reviewing applications for funding and amendments to applications for funding

GOV2.2

## Targeted Questions

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### Governing Body—Interview

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- ▶ Ask the governing body how it ensures the financial health and well-being of the program and the Fiscal integrity of the agency.



Based on the response of the governing body, do they assume responsibility for the following:

- All major financial expenditures of the agency
- The operating budget of the agency
- The selection (except when a financial auditor is assigned by the State under State law or is assigned under local law) of independent financial auditors to report all critical accounting policies and practices to the governing body
- The financial audit
- The agency's progress in carrying out the programmatic and Fiscal provisions in its grant application, including implementation of corrective actions
- Monitoring of the agency's actions to correct any audit findings and other actions necessary to comply with applicable laws (including regulations) governing financial statement and accounting practices

#### GOV2.3

- ▶ Ask the governing body members to describe their level of involvement with the following required approval processes.

Did the governing body review and approve the following?

- The annual Self-Assessment
- Personnel policies of the agency regarding the hiring, evaluation, termination, and compensation of agency employees
- Results from monitoring conducted under section 641A(c), including appropriate follow-up activities
- Personnel policies and procedures, including policies and procedures regarding the hiring, evaluation, compensation, and termination of the Executive Director, Head Start Director, Director of Human Resources, Chief Fiscal Officer, and any other person in an equivalent position within the agency

#### GOV2.3

## Targeted Questions

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### Policy Council—Interview

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- ▶ Ask the Policy Council members to describe their involvement in and provide examples of decisions made in the areas listed below.

Is the Policy Council actively involved in the following?



- Activities to support the active involvement of parents in supporting program operations, including policies to ensure that the Head Start program is responsive to community and parent needs
- Program recruitment, selection, and enrollment priorities
- Applications for funding and amendments to applications for funding
- Budget planning for program expenditures, including policies for reimbursement related to and participation in Policy Council activities
- Developing by-laws for the operation of the Policy Council
- Program personnel policies and decisions regarding the employment of program staff consistent with 642(c)(1)(E)(iv)(IX) and including standards of conduct for program staff, contractors, and volunteers and criteria for the employment and dismissal of program staff
- Developing procedures for how members of the Policy Council of the Head Start program are elected
- Providing recommendations on the selection of delegate agencies and the service areas for such agencies
- Program design and operations
- Planning goals and objectives

GOV2.4



## Program Governance Key Indicator #3–Reporting to Governing Body and Policy Council

*The program provides all of the required reports to the governing body and the Policy Council to ensure they have the necessary information to make decisions and provide effective oversight of the program.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
3.1	<p>Governing body and Policy Council members regularly receive and use information or reports about program planning, policies, and operations, including:</p> <ul style="list-style-type: none"> <li>• Monthly financial statements (including credit card expenditures), program information summaries, program enrollment reports (including attendance reports for children whose care is partially subsidized by another public agency), and reports of meals and snacks provided through USDA programs</li> <li>• The annual financial audit, Self-Assessment (including findings related to such assessment), and Program Information Report (PIR)</li> <li>• The community-wide strategic planning and needs assessment (the Community Assessment) of the Head Start agency, including applicable updates</li> <li>• Communication and guidance from the Secretary</li> </ul> <p><i>Note: Applies to grantees only. Single or multiple reports may be used to capture the information listed above.</i></p>	<p>642(d)(2)(A) 642(d)(2)(B) 642(d)(2)(C) 642(d)(2)(D) 642(d)(2)(E) 642(d)(2)(F) 642(d)(2)(G) 642(d)(2)(H) 642(d)(2)(I)</p>

### Targeted Questions

#### Policy Council—Interview

- ▶ Ask the Policy Council how often they receive the reports listed below. Discuss whether the reports provided to the Policy Council contain the information needed to provide effective oversight.

Document whether the Policy Council receives the following reports as often as required:

#### Annual reports

- The financial audit
- The Self-Assessment, including any related findings
- Program Information Report (PIR)

#### Monthly Reports

- Financial statements, including credit card expenditures (if the program uses credit cards)
- Program information summaries



- Program enrollment reports, including attendance reports for children whose care is partially subsidized by another public agency
- Reports of meals and snacks provided through programs of the U.S. Department of Agriculture (USDA)

#### **Additional reports**

- Every 3 years, the community-wide strategic planning and needs assessment (Community Assessment) of the Head Start agency
- Applicable current updates from the Secretary (i.e., Program Instructions, Information Memoranda, etc.)

Ask the members whether the reports they received contributed useful and timely information that support the Policy Council's decision-making. If the reports are of poor quality and cannot be used by the Policy Council, capture that in your notes.

GOV3.1

### **Governing Body—Interview**

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- ▶ Ask the governing body how often they receive the reports listed below. Document whether the governing body receives the following reports as often as required.

#### **Annual reports**

- The financial audit
- The Self-Assessment, including any related findings
- Program Information Report (PIR)

#### **Monthly Reports**

- Financial statements, including credit card expenditures (if the program uses credit cards)
- Program information summaries
- Program enrollment reports, including attendance reports for children whose care is partially subsidized by another public agency
- Reports of meals and snacks provided through programs of the US Department of Agriculture (USDA)

#### **Additional reports**

- Every 3 years, the community-wide strategic planning and needs assessment (Community Assessment) of the Head Start agency
- Applicable and current updates from the Secretary (i.e., Program Instructions, Information Memoranda, etc.)

GOV3.1



## Management Systems Introduction

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**Management Systems (SYS)** is designed to assess the systems Head Start programs design and the level of impact the implementation of these systems has on services to children and families. The OHS defines a Management System as “the framework of processes and procedures used to ensure that an organization can fulfill all tasks required to achieve its objectives.” Effective Management Systems are important to ensure that Head Start and Early Head Start programs function at their optimum level to provide high-quality services to children and families. There are five systems critical to program performance: program planning, ongoing monitoring, human resources, communication, and record keeping and reporting. The OHS has identified key elements for each system that support effective implementation of services to children and families. This section also contains an overall summary of each service area, fiscal, and program governance, identifying the strengths of each (when applicable). By monitoring Management Systems, the OHS is better able to ensure that programs establish systems designed to implement both the Head Start Program Performance Standards and the Head Start Act, and to ensure sustainable high-quality services are delivered to families and children, grantees must have effective systems in place.

### Key Indicators of Program Performance

#### *Program Planning*

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The program engages in a process of planning that includes its strategic use of information to continually plan for program management and service delivery, ensures compliance with Federal regulations, and engages key stakeholders in the planning process.

#### *Ongoing Monitoring*

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The program has an effective system for monitoring its management, operations and delivery of services.

#### *Human Resources*

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The program implements human resource practices to promote safe and healthy environments for staff, children and families and to provide services to children and families.

#### *Communication*

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The program’s communication system is designed to promote timely and accurate communication between the program and all stakeholders (e.g., parents, policy groups, staff, and community).



## *Record Keeping and Reporting*

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The program's record-keeping and reporting system is implemented to promote quality services, and ensure confidentiality of children, families, and staff.

## *Strengths and Summaries*

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The Review Team's summaries of each service area in the context of systems, including strengths as applicable.



## Management Systems

### Management Systems Key Indicator #1—Program Planning

*The program engages in a process of planning that includes the strategic use of information to continually plan for program management and service delivery, ensures compliance with Federal regulations, and engages key stakeholders in the planning process.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
1.1	<p>The program routinely engages in a process of systematic planning to:</p> <ul style="list-style-type: none"> <li>• Develop goals, objectives, and plans based on an analysis of program data and the results of the program’s Community and Self-Assessments</li> <li>• Engage stakeholders (governing bodies, policy groups, parents, and staff) in planning</li> <li>• Use program data to design and implement changes to improve program services on an ongoing basis</li> </ul>	<p>1304.51(a)(1) 1304.51(a)(1)(i) 1304.51(a)(1)(ii) 1304.51(a)(1)(iii)</p>
1.2	<p>At least annually, the program conducts a Self-Assessment of program effectiveness that:</p> <ul style="list-style-type: none"> <li>• Assesses progress in meeting local program goals and objectives</li> <li>• Evaluates program compliance with Federal requirements</li> <li>• Results in improvement plans</li> </ul>	<p>641A(g)(1) 641A(g)(2)(B)</p>

### Targeted Questions

#### Review Team Meeting—Interview

► How does the program:

- Develop goals, objectives, and plans based on an analysis of program data and the results of the program’s Community and Self-Assessments
- Engage stakeholders (governing bodies, policy groups, parents, and staff) in planning
- Use program data to design and implement changes to improve program services on an ongoing basis

SYS1.1



## Head Start/Early Head Start Director—Interview/Debrief

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- ▶ How does the program:
  - Develop goals, objectives, and plans based on an analysis of program data and the results of the program’s Community and Self-Assessments
  - Engage stakeholders (governing bodies, policy groups, parents, and staff) in planning
  - Use program data to design and implement changes to improve program services on an ongoing basis

SYS1.1

## Targeted Questions

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### Head Start/Early Head Start Director—Interview/Debrief

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- ▶ With the Director, review the program’s Self-Assessment. Discuss the process the program uses to conduct the Self-Assessment, including:
  - How frequently it is conducted
  - How the program evaluates progress toward program goals
  - How improvement plans are developed

SYS1.2



## Management Systems Key Indicator #2—Ongoing Monitoring

*The program has an effective system for monitoring its management, operations, and delivery of services.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
2.1	<p>The program established and implements procedures for the ongoing monitoring of its operations and services to ensure compliance. The program's ongoing monitoring:</p> <ul style="list-style-type: none"> <li>• Uses effective tools and procedures to ensure the program is in compliance and meets its goals and objectives</li> <li>• Clearly defines staff roles and responsibilities in program oversight</li> <li>• Conducts frequent, ongoing monitoring activities</li> <li>• Collects and uses data for planning activities and to ensure compliance</li> <li>• Ensures ongoing monitoring in delegate agencies takes place</li> </ul>	641A(g)(3)

### Targeted Questions

#### Head Start/Early Head Start Director—Interview/Debrief

► How does the program:

- Use effective tools and procedures to ensure it is in compliance and meets its goals and objectives
- Clearly define staff roles and responsibilities in program oversight
- Conduct frequent, ongoing monitoring activities
- Collect and use data for planning activities and to ensure compliance
- Ensure ongoing monitoring of delegate agencies takes place

SYS2.1

#### Review Team Meeting—Interview

► How does the program:

- Use effective tools and procedures to ensure it is in compliance and meets its goals and objectives
- Clearly define staff roles and responsibilities in program oversight
- Conduct frequent, ongoing monitoring activities
- Collect and use data for planning activities and to ensure compliance
- Ensure ongoing monitoring of delegate agencies takes place



## Health Services Coordinator—Interview

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- ▶ This program has not been open for 45 days (or 30 days for programs operating shorter durations). Ask the Health Coordinator to describe:
  - The process the program uses to ensure all enrolled children receive the required screenings within 45 days of entry
  - The steps taken if the program determines that a child has not received all required screenings
  
- ▶ This program has not been open for 90 days (or 30 days for programs operating shorter durations). Ask the Health Coordinator to describe the process the program uses to ensure all children have a determination (as to whether they are up-to-date on preventive and primary health care) within 90 days of entry into the program?

SYS2.1



## Management Systems Key Indicator #3—Human Resources

*The program implements Human Resource practices to promote safe and healthy environments for staff, children, and families and provide services to children and families.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
3.1	<p>The program's Human Resources system supports the delivery of services to children and families. The program:</p> <ul style="list-style-type: none"> <li>Supervises and supports staff and provides adequate mechanisms for staff supervision and support. Major functions and responsibilities assigned to each staff person include, minimally: Program Management, Child Health and Safety, and Family and Community Engagement.</li> <li>Maintains an organizational structure that supports its goals and objectives</li> <li>Assigns all major program functions and responsibilities to staff</li> </ul>	<p>1304.52(a)(1) 1304.52(a)(2)</p>
3.2	<p>The program develops and implements written standards of conduct that are available to all staff and contain provisions for appropriate penalties when violations occur.</p> <p><i>Note: 1304.52(i)(1)(iii) was removed from this section and is now located in CHS 5.5.</i></p>	<p>1304.52(i)(1) 1304.52(i)(1)(i) 1304.52(i)(1)(ii) 1304.52(i)(1)(iv) 1304.52(i)(3)</p>
3.3	<p>The program ensures that each staff member completes a screening for tuberculosis.</p>	<p>1304.52(k)(1)</p>
3.4	<p>Prior to employing an individual, the program obtains a:</p> <ul style="list-style-type: none"> <li>Federal, State, or Tribal criminal record check (CRC) covering all jurisdictions in which it provides Head Start services to children</li> <li>Federal, State, or Tribal CRC as required by the law of the jurisdiction in which the program provides Head Start services</li> <li>CRC as otherwise required by Federal law</li> </ul>	<p>648A(g)(3)(A) 648A(g)(3)(B) 648A(g)(3)(C)</p>

### Targeted Questions

#### Head Start/Early Head Start—Interview/Debrief

- Describe the organizational structure and the assignment of staff responsibilities and determine whether any vacancies affect the achievement of the goals and objectives of the program.

Determine how the program maintains an organizational structure that meets its goals and objectives. Are all major program functions and responsibilities assigned to staff?

If vacancies exist, ask how the program adjusts to ensure the positions' responsibilities are taken on by other staff. Determine whether services to children and families are negatively



impacted by the vacancies. If so, document how long the vacancies have existed and how they impact services.

Are staff supervised and supported so that they receive the tools they need to be successful in their roles?

SYS3.1

## Review Team Meeting—Interview

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▶ How does the program:

- Maintain an organizational structure that supports its goals and objectives
- Assign all major program functions and responsibilities to staff
- Provide adequate supervision and support to staff

SYS3.1

## Targeted Questions

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### Head Start/Early Head Start Director—Interview/Debrief

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▶ Ask the Director to describe how the program informs staff about the standards of conduct. What policies and procedures does the program have in place to ensure that the standards are followed?

If there were any violations of the program's standards of conduct, talk to the Director about such violations and determine what penalties were applied.

SYS3.2

## Targeted Questions

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### Staff File

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Summary of Results for Staff Tuberculosis Screenings:

▶ Has a tuberculosis (TB) screening been completed?

SYS3.3



## Targeted Questions

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### Staff File

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- ▶ Did the program obtain one of the following for the employee?
  - A State, Tribal, or Federal criminal record check covering all jurisdictions in which the grantee provides Head Start services to children
  - A State, Tribal, or Federal criminal record check as required by the law of the jurisdiction in which the grantee provides Head Start services
  - A criminal record check as otherwise required by Federal law
- ▶ Was the employee hired within the last 12 months?
- ▶ Was the criminal record check conducted prior to employment?

SYS3.4

### Head Start/Early Head Start Director—Interview/Debrief

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- ▶ If any staff members did not have CRCs or were hired within the last 12 months and did not complete CRCs prior to hire, talk to the Head Start Director regarding the policies in place and determine why checks were not completed and what, if any, steps will be taken to correct the issue.

SYS3.4

### Criminal Record Checks—Document

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- ▶ Ask the Head Start Director or Human Resources Manager for a copy of the criminal record check (CRC)-tracking data that indicates the date each (CRC) was completed and the date of hire for each staff member.

Use this tracking sheet during your discussions with the Reviewers to compare the accuracy of what they saw in the files with what is seen in the tracking system.

Determine whether the program has completed CRCs and whether CRCs were completed prior to hire for the following staff: teacher aides/assistants, food preparation staff, bus monitors, and FCE staff. If you have concerns regarding the information documented in the CRC-tracking data, or if the team's staff file reviews have found a large number of staff completed CRCs late or not at all, compare a sample of the data from the tracking system with the actual staff files of the teacher aides/assistants, food preparation staff, bus monitors, and FCE staff.

SYS3.4



## Management Systems Key Indicator #4—Communication

*The program’s communication system is designed to promote timely and accurate communication between the program and all stakeholders (e.g., parents, policy groups, staff, and the community).*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
4.1	<p>The program has communication mechanisms in place that provide:</p> <ul style="list-style-type: none"> <li>• Sharing of accurate and timely information with staff to support outcomes for children and families</li> <li>• Sharing of accurate and timely information with parents, policy groups, and the general community</li> </ul>	1304.51(b)

### Targeted Questions

#### Head Start/Early Head Start Director—Interview/Debrief

- ▶ How does the program:
  - Share accurate and timely information with staff to support outcomes for children and families
  - Share accurate and timely information with parents, policy groups, and the general community

SYS4.1

#### Review Team Meeting—Interview

- ▶ How does the program:
  - Share accurate and timely information with staff to support outcomes for children and families
  - Share accurate and timely information with parents, policy groups, and the general community

SYS4.1



## Management Systems Key Indicator #5—Record Keeping and Reporting

*The program's record-keeping and reporting systems are implemented to promote quality services and ensure confidentiality of information on children, families, and staff.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
5.1	<p>The program establishes and maintains a record-keeping system that supports the delivery of services to children and families. The program:</p> <ul style="list-style-type: none"> <li>• Consistently collects and records data in an accurate and timely manner for children, families, and staff</li> <li>• Generates reports to inform planning, communication, and ongoing monitoring</li> <li>• Makes information accessible to appropriate parties</li> <li>• Maintains confidentiality</li> </ul>	1304.51(g)
5.2	<p>The program publishes and makes available to the public an Annual Report that contains:</p> <ul style="list-style-type: none"> <li>• An explanation of the budgetary expenditures and proposed budget for the Fiscal year</li> <li>• An explanation of the agency's efforts to prepare children for kindergarten</li> </ul>	644(a)(2) 644(a)(2)(B) 644(a)(2)(G)

### Targeted Questions

#### Head Start/Early Head Start Director—Interview/Debrief

- ▶ With the Head Start Director, discuss the program's record-keeping system.
  - What data system does the program use?
  - How does the program ensure that the data are accurate and up to date? (e.g., ERSEA data, children kept up to date)
  - In what ways does the program use its data?
  - How does the program ensure data are kept confidential?

SYS5.1

#### Review Team Meeting—Interview

- ▶ How does the program:
  - Keep records up-to-date
  - Consistently collect and record data
  - Generate reports to inform planning, communication, and ongoing monitoring



- Make information accessible to appropriate parties
- Maintain confidentiality

SYS5.1

## Targeted Questions

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### Head Start/Early Head Start Director—Interview/Debrief

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- ▶ With the Director, review the program’s Annual Report. Discuss how the Annual Report is made public. Describe the information included in the report, including:
  - An explanation of budgetary expenditures and proposed budget for the Fiscal year
  - Information on school readiness and how the grantee works to prepare children for kindergarten

SYS5.2



## Management Systems Key Indicator #6—Strengths and Summaries

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
6.1	Describe one or more program strength(s).	Strength
6.2	Summarize the program’s performance in the areas of Fiscal Integrity, Child Health and Safety, Family and Community Engagement, Child Development and Education, ERSEA, and Program Governance.  <i>Note: Separate summaries will be written by the respective Reviewer for each of the service areas listed above.</i>	Summary Analysis
6.3	Summarize the systems the program has in place to support the delivery of services to children and families.	Systems Analysis

### Targeted Questions

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#### Program Strengths

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- ▶ Each night as a Review Team, discuss the grantee’s areas of strength. Throughout the week, the team should collect additional information on the areas of strength to inform the final documentation of strengths at the end of the week.

SYS6.1

### Targeted Questions

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#### Program Planning- Content Area Summaries

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- ▶ Provide a Summary for how the program:
  - Develops goals, objectives, and plans based on an analysis of program data and the results of the program’s Community and Self-Assessments
  - Engages stakeholders (governing bodies, policy groups, parents, and staff) in planning
  - Uses program data to design and implement changes to improve program services on an ongoing basis

SYS6.2



## Ongoing Monitoring- Content Area Summaries

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- ▶ Provide a Summary for how the program:
  - Uses effective tools and procedures to ensure it is in compliance and meets its goals and objectives
  - Clearly defines staff roles and responsibilities in program oversight
  - Conducts frequent, ongoing monitoring activities
  - Collects and uses data for planning activities and to ensure future compliance
  - Ensures ongoing monitoring of delegate agencies takes place

SYS6.2

## Human Resources- Content Area Summaries

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- ▶ Provide a Summary for how the program:
  - Maintains an organizational structure that supports its goals and objectives
  - Assigns all major program functions and responsibilities to staff
  - Provides adequate supervision and support to staff

SYS6.2

## Communication- Content Area Summaries

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- ▶ Provide a Summary for how the program:
  - Shares accurate and timely information with staff to support outcomes for children and families
  - Shares accurate and timely information with parents, policy groups, and the general community

SYS6.2

## Record Keeping- Content Area Summaries

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- ▶ Provide a Summary for how the program:
  - Keeps records up to date
  - Consistently collects and records data
  - Generates reports to inform planning, communication, and ongoing monitoring
  - Makes information accessible to appropriate parties
  - Maintains confidentiality



## Targeted Questions

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### Review Team Meeting—Program Planning

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- ▶ How does the program:
  - Develop goals, objectives, and plans based on an analysis of program data and the results of the program’s Community and Self-Assessments
  - Engage stakeholders (governing bodies, policy groups, parents, and staff) in planning
  - Use program data to design and implement changes to improve program services on an ongoing basis

SYS6.3

### Review Team Meeting—Ongoing Monitoring

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- ▶ How does the program:
  - Use effective tools and procedures to ensure it is in compliance and meets its goals and objectives
  - Clearly define staff roles and responsibilities in program oversight
  - Conduct frequent, ongoing monitoring activities
  - Collect and use data for planning activities and to ensure future compliance
  - Ensure ongoing monitoring of delegate agencies takes place

SYS6.3

### Review Team Meeting—Human Resources

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- ▶ How does the program:
  - Maintain an organizational structure that supports its goals and objectives
  - Assign all major program functions and responsibilities to staff
  - Provide adequate supervision and support to staff

SYS6.3

### Review Team Meeting—Communication

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- ▶ How does the program:
  - Share accurate and timely information with staff to support outcomes for children and families



- Share accurate and timely information with parents, policy groups, and the general community

SYS6.3

## Review Team Meeting—Record Keeping

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- ▶ How does the program:
  - Keep records up to date
  - Consistently collect and record data
  - Generate reports to inform planning, communication, and ongoing monitoring
  - Make information accessible to appropriate parties
  - Maintain confidentiality

SYS6.3



## Fiscal Integrity Introduction

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**Fiscal Integrity (FIS)** assesses a grantee’s compliance with Head Start Performance Standards and Federal cost principle requirements to ensure that programs have sound internal controls, strong reporting systems, and use Federal funds for intended purposes. By monitoring Fiscal Integrity, the OHS is better able to ensure that the overarching goals of Head Start are met through programs that are properly using federal funds to best support children and families.

### Key Indicators of Program Performance

#### *Financial Management Systems*

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The program implements a sound financial system that meets the required Federal standards for financial reporting, accounting records, internal control, budget control, compliance with cost principles, cash management, and administrative costs.

#### *Reporting*

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The program accurately reports the source and application of funds, distinguishing between the allocation of funds for each Head Start award.

#### *Procurement*

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The program develops and effectively implements procurement policies and procedures and meets, at a minimum, all requirements in the applicable Federal, State, and local statutes, regulations and administrative rules for Federal grants.

#### *Compensation*

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The program ensures that salaries charged to the award are reasonable and necessary for the accomplishment of the program’s objectives and are allocated to the grant in relationship to the relative benefit received. The program must also be able to provide documentation of all salaries charged to the award.

#### *Cost Principles*

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The program ensures all costs—direct, indirect, Federal, or non-Federal— charged to the grant award meet the standards of allowability specified in the Federal cost principles.



## *Facilities and Property*

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The program complies with all Federal requirements (e.g. adhering to the instructions in the application process and providing required documentation to Regional Offices) associated with the purchase, construction, or major renovation of facilities or equipment purchased with a purchase value of at least \$25,000.



## Fiscal Integrity

### Fiscal Integrity Key Indicator #1—Financial Management Systems

*The program implements a sound financial system that meets the required Federal standards for financial reporting, accounting records, internal control, budget control, compliance with cost principles, cash management, and administrative costs.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
1.1	<p>The grantee’s financial management systems provide for effective control over and accountability for grant and sub-grant funds, property and other assets and ensure they are used solely for authorized purposes.</p> <p><i>45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations; 45 CFR Part 92 for State, local, and Tribal Governments. Note: This question relates to the "control activities" aspect of internal controls. Control activities are the policies, procedures, techniques, and mechanisms that enforce management directives, such as the process of adhering to requirements for budget development and execution. They help ensure that actions are taken to address risks. Control activities are an integral part of an entity's planning, implementing, and reviewing, as well as accountability for stewardship of Government resources and achieving effective results.</i></p>	<p>74.21(b)(3) 74.21(b)(4) 92.20(b)(3) 92.20(b)(4) 92.26(a) 92.26(b)(1) 92.26(b)(2) 92.26(b)(3) 92.26(b)(4) 92.26(b)(5) 1301.32(a)(1) A-133(400)(d)(3) A-133(400)(d)(5)</p>
1.2	<p>The grantee sought and received prior approval in writing for budget changes where prior approval is required and received approval for hiring of designated key personnel.</p> <p><i>Note: Applies to grantees only. 45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations; 45 CFR Part 92 for State, local, and Tribal Governments. Note: All changes requiring prior approval must be submitted in writing to the Regional Grants Management Officer. If the change involves a budget revision, the program must identify the changes on an SF-424 and an SF-424A. As provided in 45 CFR 74.25(K) and 45 CFR 92.30(A)(1), approval of changes must be in writing and signed by the Regional Grants Management Officer. Hiring of designated key personnel must be approved by the Regional Office as provided in 74.25(c)(2) and 92.30(d)(3).</i></p>	<p>74.25 92.30</p>



1.3	<p>The grantee has obtained and maintained required insurance coverage for risks and liabilities.</p> <p><i>Note: 1301.11 Applies only to private nonprofit organizations.</i></p> <p><i>Note: 45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations.</i></p>	<p>74.31</p> <p>1301.11(a)</p> <p>1301.11(b)</p>
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## Targeted Questions

### Delegate Agency—Document Review

- ▶ Does the grantee have one or more delegate agencies?
- ▶ How does the grantee use information in the audits and other information from delegate agencies such as claims for reimbursement, support documentation, bank statements and advance payment requests for monitoring?
- ▶ Are recommendations discussed with the delegate agencies and corrective action developed?
- ▶ How does the grantee ensure corrective action occurred?
- ▶ If delegate agencies receive advance payments, how is the amount determined and does the grantee recover the advance amounts by the end of the grant year?
- ▶ What documentation is included with the requests for payment and how are the requests processed?

FIS 1.1

### Financial Reports/Accounting Records—Document

- ▶ Review grantee correspondence and notices from the Internal Revenue Service, State Income Tax, State Tax Withholding, Workers Compensation and Unemployment Compensation documents. Does any correspondence indicate unresolved compliance issues such as unpaid amounts that were past due, material significant penalties for late, missing or incomplete returns or reports? If yes, describe all unresolved issues in detail and indicate the amount of any levies, taxes, payments, penalties and interest claimed by the authority.
- ▶ If a review of grantee correspondence and notices from the Internal Revenue Service, State Income Tax, State Tax Withholding, Workers Compensation and Unemployment Compensation documents revealed that there were unresolved issues with late payroll taxes or late insurance premiums, can the agency document that no portion of the taxes or insurance premiums were related to the Head Start program?
- ▶ Are there amounts due but not remitted (e.g. unpaid taxes or insurance premiums)? If yes, did the grantee draw down funds from PMS For the unremitted taxes or premiums?

FIS 1.1



## Fiscal Officer—Interview

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- ▶ What method does the program use to ensure that funds are available for payment of any vested accrued leave owed to employees of the grantee?
- ▶ What is the program's procedure for reviewing credit card charges/retail store credit charges to insure that only authorized signatories use agency credit cards and that charges are reasonable and necessary for program operations?
- ▶ Since the completion of the most recent audit, have there been significant changes in Fiscal staffing or to financial systems? If so, how has potential negative impact associated with these changes been mitigated?
- ▶ Is the grantee current in processing of transactions, payments to vendors, and production of financial reports for staff, the Board, and the Policy Council? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Is the agency current in its payments to the Internal Revenue Service and State tax authorities (significant amounts not remitted when due and/or significant penalties, interest or levies related to late filings or late remittance)? Please describe the evidence you observed in arriving at your conclusion.
- ▶ What is your and your staffs' experience and educational level?
- ▶ Is the staffing level adequate to provide for appropriate segregation of duties? Please describe the evidence you observed in arriving at your conclusion.

FIS 1.1

## General Ledger—Document

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- ▶ Review a report or listing of aged payables. Are bills and invoices paid on time (not more than 30 days past due unless disputed)?
- ▶ Review two consecutive bank statements. Are bank statements reconciled to the general ledger? Are reconciling items (including outstanding checks) resolved within 30 days? Do checks clear the bank by the second statement after the issue date?
- ▶ Do the grantee's Fiscal records differentiate development and administrative costs from program costs to insure that development and administrative costs do not exceed 15 percent of the total grant (unless a waiver granting a higher percentage has been received)?
- ▶ If the reconciliations show any checks outstanding more than 60 days, can the grantee show that payments were disbursed (checks signed and issued to the payees) on or near the date on which the checks were written?

FIS 1.1

## Non-Personnel Costs—Transaction

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- ▶ Are approvals of the documents supporting this transaction consistent with the approval process described in the organization's Fiscal policies and procedures? Is the approver someone other than the person making the order? Was a purchase order completed (if



required by the organization's policies and procedures)? Please describe the evidence you observed in arriving at your conclusion.

- ▶ Is credit card use consistent with the organization's written policy? Please describe the evidence you observed in arriving at your conclusion.
- ▶ How did the grantee ensure the services were performed or the goods received before the payment was processed? Please describe the evidence you observed in arriving at your conclusion.
- ▶ This question applies only to construction or renovation contracts of \$2,000 or greater. Davis-Bacon Act: Has the grantee provided assurance that laborers and mechanics were paid prevailing wage rate (by comparison of the contractor's payroll to the U.S. Department of Labor wage determination)?
- ▶ If payment was made by check, has the check cleared the bank? If not, does the grantee maintain documentation to demonstrate the payment was disbursed (check written, signed and issued to the vendor)? Please describe the evidence you observed in arriving at your conclusion.

FIS 1.1

### FIFO & Audit—Document

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- ▶ Does the most recent audit include audit findings either directly or indirectly related to the Head Start program?
- ▶ Are there unresolved audit findings which should be considered by the reviewer?
- ▶ Do audit reports disclose any companies related to the grantee organization providing services and/or facilities to the Head Start program?
- ▶ Does the latest audit report describe potential impairment of financial health or significant issues outside of audit findings which should be considered by the reviewer?
- ▶ Are there specific issues involving key personnel which should be considered by the reviewer?
- ▶ Did the Regional Office list any other issues which should be considered by the reviewer?

FIS 1.1

### Procurement—Transaction

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- ▶ Were the grantee's written procurement procedures followed (use of purchase orders, approvals, documentation of cost quotations, etc.)?

FIS 1.1



## Targeted Questions

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### General Ledger—Document

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- ▶ Does the grantee's financial reporting system separately account for the use of one-time funds for the construction, purchase or major renovation of facilities? Were the funds used for the intended purpose?

FIS 1.2

### FIFO & Audit—Document

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- ▶ Please list the agency's key personnel.

FIS 1.2

### Equipment—Transaction

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- ▶ If the cost of the acquisition exceeded \$25,000, was prior approval obtained from the regional office?

FIS 1.2

## Targeted Questions

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### Insurance Policies—Document

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- ▶ Can the grantee produce a current certificate showing a fidelity bond or employee dishonesty coverage on officials and employees authorized to disburse program funds?
- ▶ Review the list of vehicles purchased using Head Start funds. For a sample of vehicles, can the grantee provide current certificates of insurance showing coverage equivalent to the level of coverage on other agency-owned vehicles?
- ▶ Review the list of locations in which the grantee provides Head Start services. For a sample of locations (donated, leased, or owned), can the grantee provide current certificates of insurance for program service locations covering liability for accidents on the premises?
- ▶ Review the list of vehicles used by the agency (or its contractors) for the transport of Head Start children. For a sample of vehicles, can the grantee provide current certificates of transportation liability insurance?

FIS 1.3



## Fiscal Integrity Key Indicator #2—Reporting

*The program accurately reports the source and application of funds, distinguishing between the allocation of funds for each Head Start award*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
2.1	<p>Financial reports and accounting records are timely and complete and contain accurate information pertaining to grant or sub-grant awards, authorizations, obligations, unobligated balances, assets, liabilities, outlays (total expenditures), income, and interest. Reports include:</p> <ul style="list-style-type: none"> <li>• SF-425 (paper-based Federal Financial Report filed to Regional Office);</li> <li>• SF-425 (web-based Federal Cash Transactions Report filed with Division of Payment Management); and</li> <li>• USDA/Child and Adult Care Food Program (CACFP) reports.</li> </ul> <p><i>45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations; 45 CFR Part 92 for State, local, and Tribal Governments.</i></p>	<p>74.21(b)(1) 74.21(b)(2) 92.20(b)(1) 92.20(b)(2) 1304.23(b)(1)(i) 1304.51(h)</p>

### Targeted Questions

#### Financial Reports/Accounting Records—Document

- ▶ Were any USDA/CACFP claims reduced or rejected due to late or inaccurate reporting or improper documentation of costs resulting in a disallowance or reduced payment to the program?
- ▶ Compare the actual USDA revenue reported on the final, paper-based SF-425 filed with the budgeted amount of USDA revenue reflected on the GABI and ask the grantee to document the total food cost for the Head Start program and show the sources from which the food costs were paid. Based on your review of this documentation, was Head Start charged for food costs that should have been paid by USDA?
- ▶ Does the grantee’s most current USDA/CACFP compliance review identify any areas of noncompliance related to Fiscal issues? If yes, did USDA/CACFP disallow any costs?
- ▶ Based on your review of the grantee’s repayment of costs disallowed by USDA, were Head Start funds used to pay the disallowance?
- ▶ Using the most recent, final SF-425 and financial records document the following and identify if there is a variance between amounts recorded in the financial records, amounts reported on the audit and amounts reported on the SF-425.
- ▶ Has the grantee reconciled any variances between the amount recorded in the financial records amounts reported on the audit and amounts reported on the SF-425?
- ▶ Describe any un-reconciled variances and discuss with the Fiscal Officer.



- ▶ Did the grantee's accounting records separately identify the source and application for each Head Start award: Federal awards, authorizations, unobligated balances, assets, liabilities, outlays (total expenditures), income and interest?
- ▶ Did disbursements for the latest award reported on the most recent PMS report (the SF-425 submitted electronically each quarter) vary from the disbursements reflected in the grantee's financial records?
- ▶ Based on your review of the grantee's records, was it determined that the USDA removed the grantee from participation in the CACFP program?
- ▶ Is the total recipient share (non-Federal share) on the grantee's financial records at least as much as the amount shown on the most recent, final SF-425?

FIS 2.1



## Fiscal Integrity Key Indicator #3—Procurement

*The program develops and effectively implements procurement policies and procedures and meets, at a minimum, all requirements in the applicable Federal, State, and local statutes, regulations and administrative rules for Federal grants.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
3.1	<p>The grantee implemented procurement procedures that meet, at a minimum, all requirements specified in the applicable Federal, State, and local statutes, regulations, and administrative rules for Federal grants, including a written code or standards of conduct governing the performance of its employees engaged in awarding and administering contracts. The grantee can demonstrate that contractual agreements were met.</p> <p><i>45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations; 45 CFR Part 92 for State, local, and Tribal Governments; 2 CFR Part 230 for nonprofit organizations; 2 CFR Part 225 for State, local, and Tribal Governments; 2 CFR Part 220 for educational institutions.</i></p>	<p>74.42 74.43 74.46 74.47 92.36(b)(2) 92.36(b)(3) 92.36(b)(9) 92.36(c)(1) 220, App A(A)(2)(e) 225, App A(C)(1)(j) 230, App A(A)(2)(g) 642(c)(1)(E)(iv)(X)(aa)</p>

### Targeted Questions

#### Procurement—Transaction

- ▶ Is there a procurement transaction in excess of \$25,000?
- ▶ If the procurement is a construction or facility improvement contract or subcontract in excess of \$100,000, does each contract require a performance bond and a payment bond on the part of the contractor for 100 percent of the contract price? Describe the evidence you used in arriving at your conclusion.
- ▶ Did there appear to be a conflict of interest? Please describe the evidence you observed in arriving at your conclusion.
- ▶ How did the grantee provide for open and free competition?
- ▶ Was an analysis made of lease and purchase alternatives where appropriate?

FIS 3.1

#### Non-Personnel Costs—Transaction

- ▶ Did the grantee document the basis for its selection of the contractor or vendor (including justification for lack of competition when competitive bids or offers were not obtained)?
- ▶ Did the grantee enter into multiple procurement transactions with the same vendor related to the same product, service, or project, resulting in the grantee failing to follow its own written



procurement procedures applicable to the total amount paid to the vendor? Please describe the evidence you observed in arriving at your conclusion.

FIS 3.1



## Fiscal Integrity Key Indicator #4—Compensation

*The program ensures that salaries charged to the award are reasonable and necessary for the accomplishment of the program’s objectives and are allocated to the grant in relationship to the relative benefit received. The program must also be able to provide documentation of all salaries charged to the award.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
4.1	Original time records are prepared and properly signed by the individual employee and approved by a responsible supervisory official, and an appropriate methodology was used to allocate salaries among Head Start and other programs.	220, App A(C)(4)(a) 220, App A(J)(10)(a) 220, App A(J)(10)(b) 220, App A(J)(10)(d) 225, App A(C)(3)(a) 225, App B(8)(h)(1) 225, App B(8)(h)(3) 225, App B(8)(h)(4) 230, App A(A)(2) 230, App B(8)(m)(1) 230, App B(8)(m)(2)
4.2	Head Start or Early Head Start grant funds are not used as any part of the monetary compensation (e.g. salary, bonuses, severance) of an individual employed by the grantee who is paid at an annual rate in excess of Executive Level II (\$179,700 through calendar year 2012).	653(b)
4.3	Total compensation for personal services, including employee wages and incentive compensation payments, charged to the grant are allowable and reasonable.  <i>2 CFR Part 230 for nonprofit organizations; 2 CFR Part 225 for State, local, and Tribal Governments; 2 CFR Part 220 for educational institutions.</i>	220, App(C)(2) 220, App(C)(3) 220, App A(J)(10)(a) 225, App A(C)(2)(b) 225, App B(8)(a) 225, App B(8)(b) 230, App A(A)(3)(b) 230, App B(8)(b) 230, App B(8)(c) 230, App B(8)(j)



## Targeted Questions

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### Payroll—Transaction

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- ▶ Is the transaction part of a payroll approved by a responsible official of the organization?
- ▶ Is the transaction supported by time and attendance records (e.g., timecards, timesheets, summary records, or other supporting documentation verifying attendance) signed by the employee and signed or electronically approved by the employee or a supervisor having first-hand knowledge of the actual work performed by the employee?
- ▶ Which of the following best describes the allocation of this position?
  - The position is allocated at 100% to Head Start or 100% to Early Head Start.
  - The position is allocated only between Head Start and Early Head Start.
  - The position is allocated between Head Start/Early Head Start and a related program such as child care or state pre-K.
  - The allocation includes an unrelated program and/or central administration.
- ▶ Based on a review of available information (e.g., job description, organization chart, classroom rosters, list of programs served by the agency), is the salary properly allocated? Please describe the evidence supporting your conclusion.
- ▶ Which of these best describes the allocation between Head Start and Early Head Start?
  - The allocation between Head Start and Early Head Start uses the same percentages as those used in the GABI accompanying the approved funding application.
  - The allocation is based on actual activity.
  - The allocation is based on budgeted dollars, ability to pay, historical time studies, or fixed percentages not supported by rationale.
  - The allocation is supported by an activity base (e.g. hours of service, number of children, etc.).
  - The grantee uses another allocation methodology not described above.
- ▶ How has the grantee documented actual activity?
  - The grantee is an educational institution and uses an allocation method (including personnel activity reports) of after-the-fact confirmation.
  - The grantee is a government entity and uses periodic certification demonstrating (at least semi-annually) that the employee worked solely on the Head Start/Early Head Start award during the period covered by the certification.
  - The grantee is a nonprofit or governmental institution and uses personnel activity reports, and the grantee uses periodic certification demonstrating (at least semi-annually) that the employee worked solely on the Head Start/Early Head Start award during the period covered by the certification.



- ▶ If the grantee uses another allocation methodology, please describe the allocation methodology used. Does the methodology allocate costs in proportion to the benefits received by each program? Please describe the evidence observed in arriving at your conclusion.
- ▶ Were the personnel activity reports prepared at least monthly, and did they coincide with one or more pay periods?
- ▶ Did the activity report account for the total activity for which the employee was compensated?
- ▶ Was the personnel activity report signed by the individual employee or, for non-profit agencies only, by a responsible supervisory official having first-hand knowledge of the activities performed by the employee?
- ▶ Is the allocation supported by current data?
- ▶ Is the allocation base an appropriate measure of the benefit received by each program? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Which of these best describes the allocation between Head Start/Early Head Start and related program(s), such as State Pre-K or Child Care?
  - The allocation is based on actual activity.
  - The allocation base (e.g. total salary dollars in each program, total expenses in each program) typically requires a Negotiated Indirect Cost Rate Agreement.
  - The allocation methodology use one or more activity bases, such as the number of children served, hours of operation or time study or similar analyses based on direct hours of identifiable services provided.
  - The grantee use another allocation methodology not described above.
- ▶ Which of these best describes the allocation between Head Start/Early Head Start and unrelated programs and/or central administration?
  - The allocation between Head Start/Early Head Start and unrelated programs and/or central administration is based on actual activity.
  - The allocation between Head Start/Early Head Start and unrelated programs and/or central administration is based on budgeted dollars, ability to pay, or fixed percentages not supported by rationale.
  - The allocation between Head Start/Early Head Start and unrelated programs and/or central administration is supported by an activity base (e.g. number of transactions, number of supervised staff).
  - The grantee uses another allocation methodology not described above.

FIS 4.1



## Targeted Questions

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### Financial Reports/Accounting Records—Document

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- ▶ Does the grantee's most recent IRS Form 990, individual W-2 statement, or final year end payroll register list any employee with compensation exceeding the Level II rate?
- ▶ For employees identified in the grantee's IRS Form 990 or individual W-2 statements as having compensation exceeding the Executive Level II rate, is any portion of their compensation paid from Head Start funds (directly charged or as part of an indirect rate) or claimed as non-Federal share (match or in-kind)?

FIS 4.2

## Targeted Questions

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### Fiscal Officer—Interview

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- ▶ How (and how recently) has the grantee ensured that paid wages are comparable to wages paid for comparable positions within the organization or those paid for similar work in the labor markets in which the organization competes?
- ▶ If the grantee received COLA funds, were the funds distributed in accordance with the terms of the grantee's funding award? Please describe the evidence you observed in arriving at your conclusion.
- ▶ If the grantee has an incentive compensation plan, how recently has it been used to compensate Head Start employees and how is reasonableness of payments determined?

FIS 4.3

### Payroll—Transaction

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- ▶ Does the organization have similar work in other activities (outside of Federal awards)?
- ▶ Is the employee pay rate for Head Start work supported by a wage comparability study that establishes comparable compensation for similar work in the labor markets in which the organization competes?
- ▶ Is compensation consistent with the established policies of the educational institution?
- ▶ Is compensation consistent with that paid for similar work in other activities?
- ▶ Did the grantee document that the employee had: (a) achieved cost reduction, (b) met criteria for efficient performance, (c) submitted suggestions or d) achieved safety goals?
- ▶ Does this transaction include any incentive compensation payments or paid bonuses (with or without an agreement for payment)?
- ▶ Was incentive compensation paid according to existing incentive compensation agreements entered into between the organization and the employee in good faith before services were



rendered or made according to an established plan consistently followed by the organization?

FIS 4.3



## Fiscal Integrity Key Indicator #5—Cost Principles

*The program ensures all costs—direct, indirect, Federal, or non-Federal— charged to the grant award meet the standards of allowability specified in the Federal cost principles.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
5.1	<p>The grantee has implemented procedures to determine allowability, allocability, and reasonableness of costs charged against its Head Start and Early Head Start grant awards as required by the applicable cost principles. If the grantee is required to allocate costs between funding sources (including Head Start and Early Head Start awards), the program utilizes a method for allocating costs that reflects the relative degree of benefit for each program receiving the benefit of the allocated cost.</p> <p><i>2 CFR Part 225 for State, local, and Tribal Governments; 2 CFR Part 220 for educational institutions. Reasonable: 230, App A(A)(3) 225, App A(C)(2) 220, App A(C)(3) Allowable: 225, App A(C)(1) 220, App A(C)(2) 230, App A(A)(2) Allocable: 225, App A(C)(3) 220, App A(C)(4) 230, App A(A)(4) Note: The requirement to allocate costs applies only to programs that do not have a negotiated and approved indirect cost rate OR programs that have a negotiated and approved indirect cost rate and also have other allocated costs.</i></p>	<p>220, App A(A)(2)(e) 220, App A(C)(2) 220, App A(C)(3) 220, App A(C)(4) 225, App A(C)(1) 225, App A(C)(2) 225, App A(C)(3) 230, App A(A)(2) 230, App A(A)(3) 230, App A(A)(4)</p>
5.2	<p>Indirect cost charges are supported by a negotiated and approved indirect cost rate.</p> <p><i>2 CFR Part 230 for nonprofit organizations; 2 CFR Part 225 for State, local, and Tribal governments; 2 CFR Part 220 for educational institutions. Note: Applies only to programs with an approved negotiated indirect cost rate.</i></p>	<p>225, App A(C)(3)(a) 230, App A(A)(2)(a) 230, App A(E)(2)(c) 1301.32</p>
5.3	<p>The grantee can demonstrate that all contributions of non-Federal share (NFS), including cash and third-party in-kind (such as donated services, goods or supplies), are necessary and reasonable for accomplishing program objectives, allowable under applicable cost principles, and allocable if also benefiting another award. Financial records are also sufficient and support the verification of adherence to applicable cost principles.</p> <p><i>45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, non-profit organizations and commercial organizations; 45 CFR Part 92 for State, local, and Tribal Governments. Note: The use of cash and in-kind contributions must meet the same standards applicable to an expenditure of grant funds. They must support the accomplishment of program objectives and not benefit individual children or their families.</i></p>	<p>74.23(a)(1) 74.23(a)(2) 74.23(a)(3) 74.23(a)(4) 74.23(a)(5) 74.23(d) 74.23(f) 74.23(h)(1) 74.23(h)(2) 74.23(h)(3) 74.23(i)(1) 74.23(i)(2) 92.24(a)(1) 92.24(b)(1)</p>



	<b>Compliance Measures</b>	<b>Federal Regulations</b>
		92.24(b)(3) 92.24(b)(6) 92.24(b)(7)(i) 92.24(b)(7)(iv) 92.24(c)(1) 92.24(d) 92.24(e)(2)(i) 92.24(g)
5.4	During each funding period reviewed, the grantee charged to the award only costs resulting from obligations incurred during the funding period.	74.28 92.23(a)

## Targeted Questions

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### Journal Entries—Transaction

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- ▶ Why was the journal entry created and is the amount allowable and reasonable? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Did the documentation show that the cost was allocated to Head Start in proportion to the benefit received?

FIS 5.1

### Grantee-Owned Facilities—Transaction

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- ▶ Can the grantee document through a space map or other mechanism how the portion of the building allocable to Head Start was determined?

FIS 5.1

### Leased Facilities—Transaction

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- ▶ Can the grantee document through a space map or other mechanism how the portion of the building allocable to Head Start is determined? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.1

### Non-Personnel Costs—Transaction

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- ▶ Was the cost supported by a contract or an invoice, if appropriate? Please describe the evidence you observed in arriving at your conclusion.



- ▶ Does the grantee maintain documentation with adequate information to support a determination that the expense is allowable, reasonable, necessary, and allocable (i.e., supporting the need for the purchased product and its benefit to Head Start)? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.1

## FIFO & Audit—Document

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- ▶ Does Head Start/Early Head Start share resources or personnel with other programs or with central administration?
- ▶ Are there cost allocation issues which should be considered by the reviewer?

FIS 5.1

## Payroll—Transaction

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- ▶ Were the amounts awarded reasonable; i.e. the total compensation including the incentive was not excessive compared to the normal salary paid for similar work in the labor markets in which the organization competes for the kind of employees involved? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.1

## Targeted Questions

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### Financial Reports/Accounting Records—Document

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- ▶ If the final, paper-based SF-425, revenue/expense report, or other financial record reflect a claim for indirect costs, does the NOA reflect an award for indirect costs, and does the grantee have a current negotiated Indirect Cost Rate Agreement?
- ▶ If the grantee has an established Indirect Cost Rate Agreement, is the total indirect cost on the most recent final, paper-based SF-425 computed per the approved agreement?
- ▶ Are the indirect costs charged to Head Start also included in the grantee's development and administrative cost for the period? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.2

### General Ledger- Document

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- ▶ Do the grantee's financial records differentiate between indirect cost charges and direct cost charges? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.2



## FIFO & Audit—Document

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- ▶ Does the grantee use an indirect cost rate?
- ▶ Are there any issues related to indirect costs which should be considered by the reviewer?

FIS 5.2

## Targeted Questions

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### FIFO & Audit—Document

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- ▶ Any there any issues related to non-Federal share which should be considered by the reviewer?

FIS 5.3

### Non-Federal Share—Transaction

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- ▶ If applicable to the type of donated service, are claims supported by records identifying the number of children served and the service provided?
- ▶ For donated space (other than space in family homes or occasional space rental), is the claimed value supported by a current appraisal performed by a licensed independent appraiser (e.g., certified real property appraiser or General Services Administration representative) and certified by a responsible official of the recipient? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Was the cash expended for allowable costs necessary and reasonable for the operation of the Head Start program?
- ▶ This question only applies if cash match was from state or local government funds. Has the grantee established that the claimed match is not from funds paid by the Federal Government under another award, except where authorized by Federal Statute, or the funds were not used to match other Federal funds? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Does the grantee administer other programs that require a match?
- ▶ How did the grantee establish the donation has not been counted toward a match for another program? Please describe the evidence you observed in arriving at your conclusion.
- ▶ For donated services, is the nature and duration of the activity, service date, location in which the service was performed, and volunteer signature included in the documentation? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Does the claimed non-Federal share appear to be allowable and necessary for the operation of the Head Start program?
- ▶ Were donated items intended to be taken home for personal use of the child or parent (e.g. clothing, household items)? Please describe the evidence you observed in arriving at your conclusion.



- ▶ Does the grantee administer other programs that require a match?
- ▶ How did the grantee establish the donation has not been counted toward a match for another award? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Was the claimed match from funds paid by the Federal Government under another award?
- ▶ Did authorizing legislation allow the funds to be used as match? Please describe the evidence you observed in arriving at your conclusion.
- ▶ For cash matches, was the cash counted as match when expended and not when received? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Did the volunteer receive payment or a stipend from another Federal program such as Foster Grandparents?
- ▶ Was the value reduced by the amount of stipend? Please describe the evidence you observed in arriving at your conclusion.
- ▶ This question applies to claims for donated services. Is the rate consistent with those rates paid for similar services in the recipient's organization (including fringe benefits) or, for services not found within the recipients organization, consistent with the rates paid for similar services in the local labor market (including fringe benefits)? Please describe the evidence you observed in arriving at your conclusion.
- ▶ This question applies to claims for donated services. Is the amount of time spent on performing the activities reasonable? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Does the in-kind primarily benefit the parent or child as outlined in OHS – PC – A – 077?
- ▶ This question applies to at-home activities. Are the parents' at home activities involved in doing things with the enrolled child that support the child's Head Start experience, that are articulated by the teacher (or home visitor) and that support the curriculum used by the program? Please describe the evidence you observed in arriving at your conclusion.
- ▶ This question applies to claims for the use of parent in-home space. Did the grantee use an outside source (e.g. market survey) to support the claimed value? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Does this claim include parent transportation of children?

FIS 5.3

## Targeted Questions

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### Payroll—Transaction

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- ▶ Was the work performed in the award period in which the related payroll cost was charged?

FIS 5.4



## Journal Entries, Non-Personnel Costs—Transaction

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- ▶ Was the cost posted to the award period in which the obligation was incurred?

FIS 5.4

## Non-Federal Share—Transaction

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- ▶ Was the cost posted to the appropriate award period?
- ▶ Was the in-kind contribution posted to the appropriate award period?
- ▶ How was value established and is it reasonable? Please describe the evidence you observed in arriving at your conclusion.
- ▶ How was value established and is it reasonable? Is the rate consistent with those rates paid for similar services in the recipient's organization (including fringe benefits) or the employee's regular rate of pay (for services provided by the employee of another organization), for services not found within the recipients organization, consistent with the rates paid for similar services in the local labor market (including fringe benefits)? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.4

## Non-Personnel Costs—Transaction

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- ▶ Was the cost posted to the appropriate award period?

FIS 5.4



## Fiscal Integrity Key Indicator #6—Facilities and Property

*The program complies with all Federal requirements (e.g. adhering to the instructions in the application process and providing required documentation to Regional Offices) associated with the purchase, construction, or major renovation of facilities or equipment purchased with a purchase value of at least \$25,000.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
6.1	The grantee has established the allowability of costs for owned or leased facilities and has adequately protected any Federal Interest in facilities through the filing of Notices of Federal Interest, insurance, and maintenance of property records. Compensation for the use of facilities owned by the grantee, a delegate agency, or other related party was through depreciation or use allowance based on the cost of the facility (excluding costs paid by Head Start). The grantee obtained advance Regional Office permission for any mortgage or loan agreements using collateral property acquired or subject to major renovation using Head Start funds and has ensured that mortgage/loan agreements include the required provisions.	220, App A(J)(14) 225, App B(11) 225, App B(37)(c) 230, App B(11)(a) 230, App B(11)(b) 230, App B(43)(c) 1309.10 1309.20 1309.21(b) 1309.21(d)(1) 1309.21(d)(2) 1309.21(d)(3) 1309.21(d)(4)(i) 1309.21(d)(4)(ii) 1309.21(d)(4)(iii) 1309.22(a) 1309.22(b) 1309.22(c) 1309.23(a)(1) 1309.23(a)(2) 1309.23(b) 1309.31(b) 1309.40
6.2	The grantee has safeguarded equipment purchased using Head Start funds by maintaining complete and accurate equipment records, verifying the accuracy of records by conducting a physical inventory, and following disposition requirements. The grantee obtained advance Regional Office permission for any mortgage or loan agreements using real property or equipment acquired with Head Start funds.	74.34(f)(1) 74.34(f)(3) 74.34(g) 74.37 92.32(d)(1) 92.32(d)(2) 92.32(e)



## Targeted Questions

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### Leased Facilities—Transaction

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- ▶ Which of the following best describes the lease?
  - This is an operating lease between the grantee/delegate and an unrelated property owner. The relationship between the grantee/delegate and the owner is arm's length. The lease does not include elements of purchase.
  - There is a less-than-arms-length relationship between the grantee/delegate and the landlord. One party to the lease agreement is able to control or substantially influence the actions of the other. Such leases include, but are not limited to those between divisions of a non-profit organization, non-profit organizations under common control through common key personnel, and a non-profit organization and a key personnel of the non-profit organization or his immediate family, either directly or indirectly in which they hold a controlling interest.
  - The lease contains at least one of the elements of a purchase:
    - the lease provides for transfer of ownership to the grantee/delegate
    - the lease provides for the grantee/delegate to purchase the property for less than fair market value
    - the duration of the lease is 75% or more of the facility's expected economic life
    - payments under the lease are at least 90% of the asset's value
- ▶ Please describe the evidence you observed in arriving at your conclusion of the description of the lease.
- ▶ This question is asked to determine whether the property was subject to a major renovation, which requires prior approval under Part 1309.

Was this facility subject to renovation paid from Head Start funds involving one or more of the following?

- The renovation involved a structural change to the foundation, roof, floor, or exterior or load-bearing walls of a facility or extension of an existing facility to increase its floor area.
  - The renovation involved extensive alteration of an existing facility, such as to significantly change its function and purpose, even if such renovation did not include any structural change to the facility.
  - The renovation cost is in excess of \$250,092 (\$200,000 adjusted for inflation since 2003) or 25 percent of the total annual direct costs approved for the grantee by ACF for the budget period in which the application was made.
- ▶ Did the grantee limit lease charges to the amount that would be allowed had the grantee purchased the property on the date the lease agreement was executed? This amount would include expenses such as depreciation or use allowance, maintenance, taxes, and insurance. Please describe the evidence you observed in arriving at your conclusion.



When reviewing evidence consider the following:

- What is the cost of the building (including any improvements and excluding the cost of the land)?
  - What is the annual depreciation of the building (based on the useful life used for financial-statement or tax purposes) or use allowance (2 percent of the cost of the facility, excluding land)?
  - What is the annual charge to the Head Start award [and/or non-Federal share claimed] for the facility?
- 
- ▶ For capital lease arrangements where charges exceed depreciation or use allowance, can the grantee show that the Regional Office approved an application for the purchase of this facility under Part 1309?
  - ▶ For leased property subject to major renovation using Head Start funds is the lease filed in the official records of the jurisdiction in which the facility is located?
  - ▶ For leased property subject to major renovation using Head Start funds does the lease (or affidavit or other document filed as Notice of Federal Interest) include the address and legal description of the property (1309.21(d)(4)(i)), acknowledge that the grant incorporated conditions that included restrictions on the use of the property and provide for a Federal interest in the property (1309.21(d)(4)(iii); and state that the property may not be used for any purpose inconsistent with that authorized by the Head Start Act and applicable regulations (1309.21(d)(4)(iii))?
  - ▶ Does the grantee's lease or other arrangement for occupancy provide the funding agency with the required right to designate a new lessee in the event of default, withdrawal, or termination; protect the Federal interest in the facility; and ensure the grantee's undisturbed use and possession of the facility?
  - ▶ Can the grantee produce a current Certificate of Insurance showing a physical-destruction insurance policy that insures the full replacement value of the facility from risk of partial and total physical destruction?

FIS 6.1

## FIFO & Audit—Document

- ▶ During this grant period or any of the two previous grant periods, has the grantee received funding for new facilities --- either traditional buildings or modular units --- or major renovation to existing facilities?
- ▶ Were there indications that charges for a facility owned by the grantee (or a related party) exceeded depreciation or use allowance?
- ▶ Were there any other facility issues?

FIS 6.1



## Fiscal Officer—Interview

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- ▶ Has the grantee received a notice of default on any mortgage or security agreement on a property with Federal interest?
- ▶ Can the grantee document that the Regional Office was informed of all instances of default related to properties with a Federal interest?

FIS 6.1

## Grantee-Owned Facilities—Transaction

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- ▶ Is Head Start charged occupancy costs for any grantee-owned facilities?
- ▶ Which of the statements below best describes the facility?
  - The facility is grantee-owned and was not acquired, constructed or renovated using Head Start funds.
  - The facility is a modular facility owned by the grantee and was acquired, constructed or renovated using Head Start funds.
  - The facility is a non-modular facility owned by the grantee and was acquired, constructed or renovated using Head Start funds.
- ▶ Can the grantee provide a written Subordination Agreement signed by an ACF official subordinating the Federal interest to the rights of the lender?
- ▶ Was this loan entered into or refinanced since the last triennial review?
- ▶ Did the review of the loan agreement find the lender was required to give written and telephonic notice to ACF in the event of a default in payment by the grantee, provide that the lender would not foreclose on the property until at least 60 days after the required notice was sent, and that ACF had the right to cure the default or name another payee?
- ▶ Can the grantee show ACF approval of a Facilities application under Part 1309?
- ▶ Can the grantee show title insurance for the full appraised value as approved by ACF or the amount of the purchase price, whichever is greater, and contains an endorsement identifying ACF as a loss payee to be reimbursed if the title fails?
- ▶ Can the grantee show it provided certified copies of the deed, lease, loan instrument, mortgage, and any other legal documents related to the acquisition or major renovation of the facility or the discharge of any debt secured by the facility to the Regional Office after their execution?
- ▶ Can the grantee produce a current Certificate of Insurance showing a physical-destruction insurance policy that insures the full replacement value of the facility from risk of partial and total physical destruction?
- ▶ If the facility is located in a flood zone, can the grantee produce a current Certificate of Insurance showing flood insurance covering the full replacement value of the facility?
- ▶ Is the building subject to a mortgage?



- ▶ Can the grantee show it recorded a Notice of Federal Interest in the appropriate official records for the jurisdiction in which a facility is located?
- ▶ For modular units not permanently affixed to land owned by the grantee or affixed to land not owned by the grantee, has the grantee posted the following notice on the modular unit: "On (date), the Department of Health and Human Services (DHHS) awarded (grant number) to (Name of grantee). The grant provided Federal funds for conduct of a Head Start program, including purchase of this modular unit. The grant incorporated conditions which included restrictions on the use and disposition of this property, and provided for a continuing Federal interest in the property. Specifically, the property may not be used for any purpose other than the purpose for which the facility was funded, without the express written approval of the responsible DHHS official, or sold or transferred to another party without the written permission of the responsible DHHS official. These conditions are in accordance with the statutory provisions set forth in 42 U.S.C. 9839; the regulatory provisions set forth in 45 CFR part 1309, 45 CFR part 74 and 45 CFR part 92; and Administration for Children and Families' grants policy."
- ▶ For non-modular facilities, is the facility located on land owned by the grantee?
- ▶ Can the grantee show a land lease or other document ensuring the right of the grantee to have undisturbed use and possession of the facility?
- ▶ Is the lease filed in the official records of the jurisdiction in which the facility is located?
- ▶ Does the land lease (or affidavit or other document) include the address and legal description of the property (1309.21(d)(4)(i)), acknowledge that the grant incorporated conditions that included restrictions on the use of the property and provide for a Federal interest in the property (1309.21(d)(4)(ii), and state the property may not be used for any purpose inconsistent with that authorized by the Head Start Act and applicable regulations (1309.21(d)(4)(iii))?
- ▶ Which of these best describes the arrangement of this modular facility?
  - The modular is permanently affixed to land owned by the grantee.
  - The modular is situated on land owned by a third party.
  - The modular is located on grantee--owned land but is not permanently affixed.
- ▶ Were non-Head Start funds used in the acquisition, construction or permanent improvement of the facility?
- ▶ Is the title in the name of the grantee?
- ▶ Did the grantee limit charges to the cost of ownership (depreciation or use allowance plus utilities, insurance and maintenance)? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Did the calculation of depreciation exclude the cost of land and any portion of the cost of buildings paid by the Federal Government? Please describe the evidence you observed in arriving at your conclusion.

FIS 6.1



## Loan Review—Transaction

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- ▶ Does the grantee have loans outstanding (other than mortgage loans related to facilities with a Federal interest)?
- ▶ Did the loan agreement exclude any claims against assets acquired or improved by Head Start funds?
- ▶ If the loan agreement did not exclude assets having a federal interest from use as collateral, did the grantee receive written approval from the Grants Management Officer (or designee) to encumber the Federal interest?

FIS 6.1

## Non-Federal Share—Transaction

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- ▶ This question applies to space in a facility owned by the grantee, being purchased by the grantee under a capital lease, or under the grantee's control in a less-than-arms-length relationship. Was the value of the donated space limited to the cost of ownership: depreciation or use allowance, maintenance, taxes, and insurance?

FIS 6.1

## Targeted Questions

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### Equipment—Transaction

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- ▶ Is the total cost of all equipment purchased with Head Start funds is less than \$50,000?
- ▶ Is the equipment supported by an entry in the grantee's equipment records including all required information (a description of the property; serial number or other identification number; source of the property; title holder; acquisition date; cost of the property; percentage of Federal participation in the cost of the property; location, use and condition of the property; and ultimate disposition data, including the date of disposal and sales price of the property)?
- ▶ Can the grantee document that the equipment was part of a physical inventory conducted at least once in the past 2 years?

FIS 6.2

### Financial Reports/Accounting Records—Document

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- ▶ Since the last triennial, has the grantee sold or disposed of any equipment with a fair market value of \$5,000 or more?
- ▶ How did the grantee determine the fair market value? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Did the grantee request and follow disposition instruction from the Regional Office?



## Loan Review—Transaction

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- ▶ If the loan agreement did not exclude assets having a federal interest from use as collateral, did the grantee receive written approval from the Grants Management Officer (or designee) to encumber the Federal interest?

FIS 6.2



## ERSEA Introduction

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**Eligibility, Recruitment, Selection, Enrollment and Attendance (ERSEA)** defines how Head Start programs recruit, select, and enroll children and families. Programs are responsible for assessing their communities and recruiting children and families who are most in need, including families below the poverty line, children with disabilities, families that are homeless, and pregnant women. Programs must have established procedures for verifying eligibility and selecting the children and families to be enrolled in their Head Start programs. Attendance must be monitored and appropriate follow-up conducted with families when attendance issues arise. By monitoring ERSEA, the Office of Head Start (the OHS) is better able to ensure that our country's neediest families and children are recruited and enrolled in an Early Childhood Education program.

### Key Indicators of Program Performance

#### *Recruitment and Selection*

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The program implements practices to ensure eligible children and pregnant women are recruited and given priority for enrollment.

#### *Eligibility*

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The program verifies eligibility and enrolls children and pregnant women according to Federal regulations.

#### *Enrollment*

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The program has practices in place to ensure maintenance of funded enrollment and at least 10% of enrollment of children with disabilities.

#### *Attendance and Participation*

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The program monitors daily attendance for center-based programs and ensures that no child's enrollment, in any program option, is contingent on payment of a fee.



## ERSEA

### ERSEA Key Indicator #1—Recruitment and Selection

*The program implements practices to ensure eligible children and pregnant women are recruited and given priority for enrollment.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
1.1	The program develops and implements a process that is designed to actively recruit families with Head Start- and/or Early Head Start-eligible children, including children with disabilities and pregnant women (if applicable), informing them of available services and encouraging them to apply for admission.	1305.5(a) 1308.5(f) 645A(c)(1)
1.2	Prior to the agency selecting and enrolling children from families whose income falls above 100 percent of the poverty line, the program has established and implemented outreach and enrollment policies and procedures to ensure that it meets the needs of the following children: <ul style="list-style-type: none"> <li>• Children from families with an income below the poverty line</li> <li>• Children from families receiving public assistance</li> <li>• Children who are homeless</li> <li>• Children in foster care</li> </ul>	645(a)(1)(B)(iii)(II)(a) a) 645(a)(1)(B)(iii)(II)(b) b)
1.3	Migrant programs give priority to children from families whose pursuit of agricultural work required them to relocate most frequently within the previous 2-year period.  <i>Note: Applies to migrant programs only.</i>	1305.6(b)

### Targeted Questions

#### ERSEA Coordinator—Interview

- ▶ Does the program have an effective system for recruitment that includes the following?
  - Defines the recruitment area, establishes recruitment goals, and develops recruitment plans using program data (e.g., Community Assessment, Self-Assessment)
  - Conducts outreach within the community
  - Ensures recruitment efforts and materials include efforts to reach families with children with severe or multiple disabilities
  - Ensures EHS program-recruitment efforts and materials include efforts to reach pregnant women



## Targeted Questions

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### ERSEA Coordinator —Interview

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- ▶ With the ERSEA Coordinator, review the program’s policies and procedures to determine whether the program has selection criteria and practices that ensure the program prioritizes children for enrollment based on:
  - Child age
  - Family income/categorical eligibility
  - Availability of kindergarten or first grade
  - Locally determined priorities

If the ERSEA Coordinator indicates that the program does not have selection criteria, ask the Coordinator to explain how children are selected for enrollment.

- ▶ With the ERSEA Coordinator, review the program’s documentation related to the selection of children for enrollment, including the waiting list, selection criteria, and documentation for currently enrolled children. Ask the ERSEA Coordinator to describe how the program:
  - Develops a waiting list and how it ranks children using the selection criteria
  - Ensures that children who are income- and categorically eligible are enrolled prior to children who are above 100 percent of the poverty guidelines
  - Maintains a waiting list throughout the year, including how vacancies are identified and children are selected to fill vacancies within 30 days
  - Conducts ongoing activities and community outreach efforts to identify underserved populations to ensure that eligible children enter the program as vacancies occur

PS 1305.7(b) allows programs to elect not to fill vacancies within 60 calendar days of the end of their program year. If the on-site monitoring review takes place within 60 calendar days of the end of the program year, document the date the program year ends.

ERSEA1.2

## Targeted Questions

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### ERSEA Coordinator —Interview

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- ▶ Ask the ERSEA Coordinator to describe the program’s selection process and how it ensures that priority is given to children from families whose pursuit of agricultural work required them to relocate most frequently within the previous 2 years.

ERSEA1.3



## ERSEA Key Indicator #2—Eligibility

*The program verifies eligibility and enrolls children and pregnant women according to Federal regulations.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
2.1	<p>Program staff verified each child's eligibility and included in each file a statement signed by a program employee identifying the child's eligibility category and the documents examined to determine eligibility.</p> <p><i>Note: Signed statements may list one of the following acceptable forms of proof of eligibility: individual Income Tax Form 1040; W-2 forms, pay stubs, pay envelopes, or employers' written statements; documentation showing current status as recipients of public assistance; and declarations of zero income. Also, note that homeless children and foster children are categorically eligible.</i></p>	<p>1305.4(c) 1305.4(d) 1305.4(e)</p>
2.2	<p>The program enrolls children who are categorically eligible (who fall within defined income-eligibility requirements). Defined Eligibility Requirements include:</p> <ul style="list-style-type: none"> <li>• Family income is below the poverty line</li> <li>• Family or child receives public assistance (SSI and TANF)</li> <li>• Family is homeless</li> <li>• Child is a foster child</li> </ul> <p>Additional income-eligibility requirements:</p> <ul style="list-style-type: none"> <li>• Ten percent of children enrolled in the program may be over the income threshold</li> <li>• An additional 35 percent of children who are not categorically eligible may be from families whose income is between 100 and 130 percent of poverty</li> </ul> <p><i>Note: Being a recipient of food stamps does not in and of itself make a child eligible for the Head Start program. Note: Does not apply to American Indian or Alaska Native grantees</i></p>	<p>645(a)(1)(B)(iii)(I) 645(a)(1)(B)(iii)(II)</p>
2.3	<p>American Indian/Alaska Native programs ensure that children who meet the following requirements are enrolled before enrolling more than 10 percent over-income children:</p> <ul style="list-style-type: none"> <li>• All income-eligible children who wish to enroll living on the reservation</li> <li>• All income-eligible children who wish to enroll and are native to the reservation but living in non-reservation areas</li> <li>• All income-eligible non-American Indian children whose families wish to enroll if the non-reservation area is not served by another Head Start program</li> </ul> <p><i>Note: Applies only to AIAN programs</i></p>	<p>1305.4(b)(3)(i) 1305.4(b)(3)(ii) 1305.4(b)(3)(iv)</p>



## Targeted Questions

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### Child File

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Summary Results for Review of Signed Statement Form:

- ▶ Is there a statement in the file verifying the child's eligibility?
- ▶ Is the statement verifying the child's eligibility signed by a program employee?
- ▶ Did the statement indicate which documents, in accordance with 1305.4(d), were examined to determine whether the child was eligible to participate in the program?
- ▶ Is there source documentation in the child's file?

ERSEA2.1

## Targeted Questions

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### Child File

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Summary Results for Review of Signed Statement Form:

- ▶ In which eligibility status did the program enroll the child?
- ▶ Using the documents present in the child file, re-determine the child's eligibility status. Did the program enroll the child using the correct eligibility?
- ▶ In which eligibility status should the program have enrolled the child?

ERSEA2.2

## Targeted Questions

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### Child File

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Summary Results for Review of Signed Statement Form:

- ▶ In which eligibility status did the program enroll the child?
- ▶ Using the documents present in the child file, re-determine the child's eligibility status. Did the program enroll the child using the correct eligibility?
- ▶ In which eligibility status should the program have enrolled the child?

### ERSEA Coordinator—Interview

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- ▶ Interview the ERSEA Coordinator about the program's enrollment process. Ask him or her to describe the program's enrollment process in detail and provide you with information on how enrollment decisions are made.

Prior to the program enrolling children whose families exceed the low-income guidelines, the AIAN program must ensure that:



- All children from Indian and non-Indian families living on the reservation that meet the low-income guidelines and who wish to be enrolled in Head Start are served.
- All children from income-eligible Indian families native to the reservation but living in non-reservation areas approved as part of the Tribe's service area, who wish to be enrolled in Head Start are served by the program.

ERSEA2.3



## ERSEA Key Indicator #3—Enrollment

*The program has practices in place to ensure maintenance of funded enrollment and at least 10% of enrollment of children with disabilities.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
3.1	<p>Actual program enrollment is composed at least 10 percent of children with disabilities.</p> <p><i>Note: Programs are expected to reach the 10 percent requirement at any point during the program year. For reviews occurring between October and January, the program must have reached 10% at any time during the previous program year. For reviews occurring between February and September the program must have reached 10% at any time during the current program year.</i></p>	<p>1308.5(c)(1) 1308.5(c)(2) 1308.5(c)(3) 1308.5(c)(4) 640(d)(1)</p>
3.2	<p>The program enrolled 100% of its funded enrollment and maintained an active and ranked waiting list at all times, with ongoing activities and community outreach to identify underserved populations and ensure that eligible children enter the program as vacancies occur.</p>	<p>1305.6(d) 642(g)</p>
3.3	<p>The program has documentation to support monthly enrollment data submitted to the Office of Head Start.</p>	<p>641A(h)(2)(A) 641A(h)(2)(B)</p>

### Targeted Questions

#### ERSEA Coordinator—Interview

- ▶ With the ERSEA Coordinator, review the program’s enrollment documentation and ERSEA tracking system to determine the percentage of children with disabilities enrolled in the program (actual enrollment).
  - If the on-site monitoring review occurs between October and January of the current program year, ask the ERSEA Coordinator to provide enrollment documentation confirming the actual program enrollment for the previous program year was at least 10 percent children with disabilities.
  - If the on-site monitoring review occurs between February and September of the current program year, ask the ERSEA Coordinator to provide enrollment documentation confirming the actual program enrollment for the current program year is at least 10 percent children with disabilities.
  - If the program is a migrant program, ask the ERSEA Coordinator to provide enrollment documentation confirming the actual program enrollment for the previous program year was at least 10 percent children with disabilities.



## Targeted Questions

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### ERSEA Coordinator –Interview

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- ▶ With the ERSEA Coordinator, review the program’s waiting list and selection criteria.

Ask the ERSEA Coordinator to describe how the program:

- Develops a waiting list and how it ranks the children who are listed on the waiting list using the selection criteria
- Maintains a waiting list throughout the year, including how vacancies are identified and children are selected to fill vacancies within 30 days
- Conducts ongoing activities and community outreach efforts to identify underserved populations to ensure that eligible children enter the program as vacancies occur

PS 1305.7(b) allows programs to elect not to fill vacancies within 60 calendar days of the end of their program years. If the on-site monitoring review takes place within 60 calendar days of the end of the program year, document the date the program year ends.

ERSEA3.2

## Targeted Questions

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### ERSEA Coordinator –Interview

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- ▶ With the ERSEA Coordinator, review of the program’s enrollment reports, for the last 12 months of operation to determine whether they:

- Were submitted to the ACF Regional Office within 14 days following the end of the previous month
- Accurately match enrollment data maintained by the grantee

Determine whether actual enrollment was less than funded enrollment, how long the shortfall existed, and whether the program submitted the reason for any existing enrollment shortfall in its report to ACF. Document the date the shortfall occurred, the reasons submitted to ACF, and any additional correspondence with ACF.

If there are inaccuracies in reporting, or reasons for under enrollment have not been submitted to ACF, ask the ERSEA Coordinator to explain why.

ERSEA3.3



## ERSEA Key Indicator #4—Attendance and Participation

*The program monitors daily attendance for center-based programs and ensures that no child's enrollment, in any program option, is contingent on payment of a fee.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
4.1	<p>When monthly average daily attendance in center-based programs falls below 85 percent (except in the case of illness or well-documented absences), the causes of absenteeism are analyzed, and the program initiates appropriate family support as needed.</p> <p><i>Note: Applies only to programs with a center-based program option</i></p>	<p>1305.8(a) 1305.8(b)</p>
4.2	<p>The program ensures that no child's enrollment or participation in the Head Start program is contingent on payment of a fee.</p> <p><i>Note: State subsidies should not be used as a contingency for enrollment or attendance in the Head Start portion of the program.</i></p>	<p>1305.9</p>

### Targeted Questions

#### ERSEA Coordinator—Interview

- ▶ With the ERSEA Coordinator, review the program's daily attendance records to determine whether, for children with four or more consecutive unexcused absences, the program made efforts to initiate appropriate family support.
- ▶ With the ERSEA Coordinator, review the program's monthly attendance reports for center-based and FCC classrooms to determine whether the program tracks and records instances when attendance falls below 85% and examines patterns of absences, reasons for absences, and the number of absences that occurred on consecutive days.

For instances in which monthly average attendance fell below 85%, ask the ERSEA Coordinator to describe how the program analyzes the patterns and causes of absenteeism and develops plans for addressing attendance issues.

ERSEA4.1

### Targeted Questions

#### Parent—Interview

- ▶ Ask parents to state whether the program charges fees in exchange for enrollment or participation in Head Start. Examples may include paying late fees, registration fees, money



for field trips, etc.. If parents are required to pay fees, determine the extent to which this affected their ability to participate in the program.

If parents are required to pay fees, verify with the Fiscal Reviewer that these fees are required. Work with the Fiscal Reviewer to collect documentation of the required payments and include them as part of your evidence.

ERSEA4.2



## Child Health & Safety Introduction

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**Child Health and Safety (CHS)** is designed to ensure that all Head Start programs are providing children and families with health and developmental services, implementing and promoting healthy practices and providing safe and supportive environments in which children can learn and grow. The CHS protocol is used to ensure that the program supports children’s health development by determining each child’s health status, screening children and making referrals as needed. The program’s healthy practices and routines are reviewed through the CHS Protocol. Additionally, the CHS Protocol is used to review the safety of physical environments and transportation services provided by the program. By monitoring CHS, the OHS can be sure that Head Start programs are holistically supporting children’s health and development and providing safe learning environments for all children.

### Key Indicators of Program Performance

#### *Access to Health and Dental Care*

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The program establishes each child’s health status and provides follow up and referral as required.

#### *Screening and Referrals*

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The program supports children’s healthy development by screening children and making referrals as needed.

#### *Safe Physical Environments*

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The program ensures physical environments are safe for children, parents, and staff.

#### *Healthy Practices and Routines*

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The program establishes and maintains healthy practices and routines.

#### *Appropriate Group Sizes and Supervision*

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The program ensures children’s safety through effective supervision and optimal learning environments by providing appropriate group sizes

#### *Safe Transportation*

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The program ensures children’s safety through effective and safe transportation.



## Child Health & Safety

### Child Health & Safety Key Indicator #1—Access to Health and Dental Care

*The program establishes each child’s health status and provides follow up and referral as required.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
1.1	The program obtains a determination from a health care professional as to whether each child is up to date on a schedule of primary and preventive health care (EPSDT), including dental, and assists parents in bringing their children up to date as needed.	1304.20(a)(1)(ii) 1304.20(a)(1)(ii)(A) 1304.20(a)(1)(ii)(B) 1304.20(a)(2)
1.2	The program takes steps to ensure that each child with a known, observable, or suspected health, dental, or developmental problem receives: <ul style="list-style-type: none"> <li>• Further diagnostic testing</li> <li>• Examination</li> <li>• Treatment from a licensed or certified health care professional</li> <li>• A follow-up plan to ensure required treatment has begun</li> </ul>	1304.20(a)(1)(iii) 1304.20(a)(1)(iv) 1304.20(c)(3)(ii)
1.3	The program involves parents, consulting with them immediately when child health or developmental problems are suspected or identified.	1304.20(e)(1)
1.4	The program: <ul style="list-style-type: none"> <li>• Informs parents of health and developmental procedures</li> <li>• Obtains their authorization prior to performing these procedures</li> <li>• Explains results</li> </ul>	1304.20(e)(2)
1.5	The program has established procedures for tracking the provision of health services.	1304.20(a)(1)(ii)(C)
1.6	The Early Head Start program helps pregnant women access, through referrals, early and regular comprehensive pre-natal and post-partum care, including: <ul style="list-style-type: none"> <li>• Early and continuing risk assessment</li> <li>• Health promotion and treatment</li> <li>• Mental health interventions</li> <li>• Follow-up, as appropriate</li> </ul> <p><i>Note: Applies only to programs serving pregnant women and new mothers</i></p>	1304.40(c)(1)(i) 1304.40(c)(1)(ii) 1304.40(c)(1)(iii)



	<b>Compliance Measures</b>	<b>Federal Regulations</b>
1.7	<p>The program ensures that a health staff member visits each newborn within two weeks after birth to ensure both the mother's and the child's well-being.</p> <p><i>Note: Applies only to programs serving pregnant women and new mothers</i></p>	1304.40(i)(6)

## Targeted Questions

### Child File

Summary Results for Program Obtaining Determinations as to Whether Children are Up-To-Date on Preventive and Primary Health Care and Whether Parents Have Been Assisted in Bringing Their Children Up-To-Date

- ▶ On what date did the program obtain the determination from the health care professional regarding whether the child was up to date on a schedule of age-appropriate preventive and primary health care (including EPSDT)?
- ▶ On what date did the health care professional make a determination as to whether the child was up-to-date on a schedule of age-appropriate preventive and primary health care (including EPSDT)?
- ▶ Did the health care professional determine that the child was up-to-date?
- ▶ Has the program assisted parents in making arrangements to bring their children up-to-date on a schedule of primary and preventive health care?

CHS1.1

### Health Services Coordinator—Interview

- ▶ Ask the Coordinator to explain the process used to keep children up-to-date throughout the program year.
- ▶ For all children who are not up-to-date on the recommended schedule of preventive and primary health care, how does the program assist parents in making arrangements to bring their children up-to-date?
- ▶ This program has not been open for 90 days (or 30 days for programs operating shorter durations).

Ask the Health Coordinator to describe the process the program uses to ensure all children have a determination (as to whether they are up-to-date on preventive and primary health care) within 90 days of entry into the program?

CHS1.1



## Targeted Questions

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### Child File

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Summary of Results for Further Testing, Examination, and Treatment for Children with Observable, Known, or Suspected Health or Developmental Problems

- ▶ Does the child have a known, observable, or suspected health, dental, or developmental problem?
- ▶ Did the program arrange for further diagnostic testing, examination, and treatment by an appropriate licensed or certified professional?
- ▶ Did the child receive follow-up treatment as recommended by the licensed or certified professional?
- ▶ Did the program develop or is the program in the process of developing a follow-up plan for the child?

CHS1.2

## Targeted Questions

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### Health Services Coordinator—Interview

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- ▶ Ask the Coordinator to describe how parents are notified when the program suspects children have health or developmental problems.
  - What methods are used to notify parents?
  - How does the program track the concerns and the notification of parents?
  - When are parents notified?

CHS1.3

## Targeted Questions

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### Health Services Coordinator—Interview

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- ▶ Ask the health services coordinator to describe his or her process for obtaining parental consent before administering any health procedures or developmental screenings.

Ask the health service coordinator to show examples of documentation of parental consent.

CHS1.4



## Targeted Questions

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### Health Services Coordinator—Interview

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- ▶ With the Coordinator, review the program's health tracking system.

Ask how often the system is updated and what staff are responsible for keeping it up to date. Does the system include all necessary information, including information on:

- Medical services
- Dental health services
- Mental Health services
- Nutrition services

For all of the above types of services, does the tracking system include:

- Dates of services
- Types of screenings, assessments, and referrals
- Results and outcomes

When reviewing the tracking system, confirm that the information in the system aligns with the information documented in the child files. Look at a sample of information for 10 children to ensure the data align. Clearly document any discrepancies in the data observed and ask program staff to clarify why the data may be different in the different sources.

CHS1.5

## Targeted Questions

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### Pregnant Women/New Mothers—Interview

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- ▶ Ask the pregnant women and new mothers how the program has helped them access care that includes:
  - Early and continuing risk assessments
  - Health promotion and treatment
  - Mental health interventions and follow-ups (when needed)

CHS1.6



## Targeted Questions

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### Health Services Coordinator—Interview

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- ▶ Ask the Health Services Coordinator how the program ensures that newborns and their mothers are visited by Health staff within 2 weeks after birth.

With the Health Coordinator, review files of new mothers and:

- Look for documentation in the files indicating when visits occurred
- If the visits occurred, determine whether Health staff member made the visit to the newborn and mother
- Document any visits that occurred more than 2 weeks after delivery or did not occur at all
- If visits occurred later than 2 weeks after birth or did not occur at all, document the reason they were late or did not occur, including whether the mother refused or delayed the visit

CHS1.7



## Child Health & Safety Key Indicator #2—Screening and Referrals

*The program supports children’s healthy development by screening children and making referrals as needed.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
2.1	<p>The program, in collaboration with each child’s parent, performs or obtains the required linguistically and age-appropriate screenings to identify concerns regarding children within 45 calendar days (30 days for programs operating shorter durations) of their entry into the program.</p> <p><i>Note: 1304.20(a)(2) applies only to grantees or delegates operating programs of shorter durations (less than 90 days) and should be cited in conjunction with 1304.20(b)(1) for such programs.</i></p>	<p>1304.20(b)(1) 1304.20(b)(2) 1304.20(b)(3) 1304.20(a)(2)</p>
2.2	<p>Children suspected of having a disability are promptly referred for further evaluation through a coordinated screening, assessment, and referral process in partnership with the Local Education Agency (LEA) and/or Part C agency.</p>	<p>1308.6(a)(1) 1308.6(a)(2) 1308.6(a)(3) 1308.6(e)(1) 1304.20(f)(2)(ii)</p>
2.3	<p>The program, in partnership with the LEA or Part C agency:</p> <ul style="list-style-type: none"> <li>• Works to inform and engage parents in all plans for screenings and referrals for evaluation</li> <li>• Ensures confidentiality of information</li> <li>• Encourages parent involvement in the IEP and IFSP process</li> </ul>	<p>1304.20(e)(4) 1308.6(c) 1308.19(j)</p>

### Targeted Questions

#### Child File

##### Summary of Results for Completion of Screenings

- ▶ Were all sensory screenings (vision and hearing) completed?
- ▶ Was the screening incomplete due to parent/guardian refusal?
- ▶ What was the latest date on which any of the sensory screenings (vision and hearing) were completed?
- ▶ Did the program make an attempt to complete the sensory screenings for the child within 45 days of the child's date of entry?
- ▶ Were all screenings for developmental concerns (including motor, language, cognitive, and perceptual skills) completed?



- ▶ Was the screening incomplete due to parent/guardian refusal?
- ▶ What was the latest date on which any of the screenings for developmental concerns were completed?
- ▶ Did the program make an attempt to complete the developmental screenings for the child within 45 days of the child's date of entry?
- ▶ Were all screenings for social, emotional, and behavioral concerns completed?
- ▶ Was the screening incomplete due to parent/guardian refusal?
- ▶ What was the latest date on which any of the screenings for social, emotional, or behavioral concerns were completed?
- ▶ Did the program make an attempt to complete the social, emotional, and behavioral screenings for the child within 45 days of the child's date of entry?
- ▶ List the screenings that were completed more than 45 days after the child's entry into the program (30 days for programs operating shorter durations). Indicate the date of each screening and how many days after the 45- (30-)day timeframe each screening was completed.

CHS2.1

### Health Services Coordinator—Interview

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- ▶ With the Health Coordinator, review the program's health-screening procedures.
  - Who does the program consult with regarding interpreting screening findings?
  - With regard to the screening process, what sources of information does the program incorporate? (The Reviewer should indicate whether there are multiple sources as required.)
  - How does the program ensure the screenings conducted are linguistically and age-appropriate and sensitive to each child's cultural background to the greatest extent possible?
- ▶ This program has not been open for 45 days (or 30 days for programs operating shorter durations).

Ask the Health Coordinator to describe:

- The process the program uses to ensure all enrolled children receive the required screenings within 45 days of entry
- The steps taken if the program determines that a child has not received all required screenings

CHS2.1



## Targeted Questions

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### Child File

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- ▶ Does the child have a suspected or identified disability? (includes children with current IEPs or IFSPs as well as children with screening results that indicate a possible disability or need for an evaluation)?
- ▶ Did the disabilities coordinator make a prompt referral to the LEA or Part C Agency?

CHS2.2

### Disabilities Coordinator—Interview

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- ▶ Ask the Disabilities Coordinator to describe his or her involvement in the following processes for all children:
  - The screening process
  - The ongoing developmental-assessment process
  - The referral process. What is the process for ensuring that referrals to the LEA or Part C agency are timely?
- ▶ If the Disabilities Coordinator made referrals to the LEA or Part C agency for specialized evaluation, ask him or her to explain how he or she ascertains the status of the referral.

CHS2.2

## Targeted Questions

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### Parent—Interview

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- ▶ Ask parents how the program informs them about:
  - The different types of screenings (should be provided prior to the child receiving the screening)
  - Results of screenings
  - The purpose of further evaluation (should be provided prior to the child receiving the evaluation)
  - Results of the evaluation

If their children were in need of IEPs or IFSPs, ask the parents how the program included them in the process of developing the IEPs or IFSPs.

CHS2.3



## Child Health & Safety Key Indicator #3—Safe Physical Environments

*The program ensures physical environments are safe for children, parents, and staff.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
3.1	Facilities used for center-based program options, home-based group socialization activities, or Family Child Care comply with State and local licensing requirements.	1306.30(c) 1306.35(d)
3.2	The program ensures that sufficient equipment, toys, materials, furniture, and facilities are provided and are age-appropriate, safe, and supportive of the abilities and developmental level of each child.	1304.53(a)(10)(xvii) 1304.53(b)(1)(iii)
3.3	The program has adequate usable indoor and outdoor space.	1304.53(a)(5) 1306.35(a)(3)
3.4	The program ensures the safety and security of children by keeping facilities, materials, and equipment well maintained, clean, and in good repair.	1304.53(a)(7) 1304.53(a)(8) 1304.53(a)(10) 1304.53(a)(10)(i) 1304.53(a)(10)(iv) 1304.53(a)(10)(v) 1304.53(a)(10)(vi) 1304.53(a)(10)(vii) 1304.53(a)(10)(viii) 1304.53(a)(10)(x) 1304.53(a)(10)(xi) 1304.53(a)(10)(xii) 1304.53(a)(10)(xiv) 1304.53(a)(10)(xvi) 1304.53(b)(3) 1306.35(b)(2)(i) 1306.35(b)(2)(ii) 1306.35(b)(2)(iii) 1306.35(b)(2)(iv) 1306.35(b)(2)(v) 1306.35(b)(2)(vi) 1306.35(b)(2)(vii) 1306.35(b)(2)(viii) 1306.35(b)(2)(ix)



## Targeted Questions

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### Safety Observation--Center

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- ▶ Does the program have a current license for this center?

CHS3.1

## Targeted Questions

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### Safety Observation—Center-Based Classroom and FCC

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- ▶ Are toys, materials, and furniture age-appropriate, safe, and supportive of the abilities and developmental level of each child served, with adaptations, if necessary, for children with disabilities?
- ▶ Does the program provide sufficient equipment, toys, materials, and furniture (including diapers and wipes) to meet the needs and facilitate the participation of children and adults?
- ▶ Were provisions made to ensure the safety, comfort, and participation of children with disabilities?

CHS3.2

## Targeted Questions

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### Safety Observation—Center-Based Classroom and FCC

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- ▶ Summary of Results for Adequate Usable Indoor and Outdoor Space:
- ▶ Does the classroom provide at least 35 square feet of usable indoor space per child (excluding bathrooms, halls, kitchens, staff rooms, and storage space)?
- ▶ Does the Family Child Care home have sufficient indoor and outdoor space that is usable by and available to children?

CHS3.3

## Targeted Questions

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### Environmental Scan

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- ▶ Please use this space to document notes based on your first impressions of the setting you are observing.



## Safety Observation—Center-Based Classroom and FCC

### Safety Observation—FCC

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- ▶ Are functioning smoke and carbon monoxide detectors installed and properly located?
- ▶ If the Family Child Care home has a basement, and local health officials recommend radon detectors, are radon detectors installed?
- ▶ Is there a system of supervision in place that ensures the safety of children not within view for any period?
- ▶ Does the provider ensure the safety of children when a body of water, road, or other potential hazard is present, or when children are being transported?
- ▶ Is there a fence to prevent children's unsupervised access to water hazards, such as swimming pools or other bodies of water?
- ▶ Did the provider secure health certificates for pets to document they have up-to-date immunizations and are free from conditions that may pose a threat to children's health?
- ▶ Did the provider ensure that pets are managed appropriately to ensure children's safety at all times?
- ▶ Does the provider ensure that alcohol and drugs are not accessible to children at all times?
- ▶ Are children safe from the potential hazards posed by appliances (stove, refrigerator, microwave, etc.), such as appliances with frayed wires, hot stoves, and refrigerator coils?
- ▶ Are the premises free from pests?
- ▶ If needed, are chemicals for controlling pests used while children are not on premises?
- ▶ Are firearms or other weapons inaccessible or kept in areas not occupied by children?
- ▶ Does the provider ensure that alcohol and drugs are not consumed while children are present?

### Safety Observation—Center-Based Classroom

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- ▶ Are the facilities, materials, and equipment well maintained and in good repair?
- ▶ Is the classroom clean?
- ▶ Are there undesirable and hazardous materials and conditions?
- ▶ Is the air quality good?
- ▶ Is the classroom free of pollutants, including mold, lead, and pesticides?
- ▶ Is lighting sufficient and adequate for classroom activities?
- ▶ Are electrical outlets accessible to children designed to prevent shock through the use of covers, installation of child-protection outlets, or use of safety plugs?
- ▶ Are windows and glass doors constructed, secured, and adjusted to prevent children's injury and escape?
- ▶ Are toilets and hand washing facilities clean, adequate in number, in good repair, and easily reached by children?



- ▶ Are toileting and diapering areas separated from areas used for cooking, eating, and children's activities?
- ▶ Does the program ensure that sleeping arrangements for infants (e.g., cribs, playpens, bassinets) are free of soft bedding materials (e.g., soft mattress, pillows, stuffed animals, fluffy blankets, comforters)?
- ▶ Is there a safe and effective heating and cooling system that is insulated to protect children and staff from potential injuries?
- ▶ Are exits clearly visible and evacuation routes clearly marked and posted so that the path to safety outside is unmistakable?

CHS3.4

### Safety Observation--Center

- ▶ Does the design of the playground and selection and layout of playground equipment and/or surfaces minimize the possibility of injury to children?
- ▶ Is the center free of air pollutants, including mold, smoke, lead, pesticides, and herbicides, as well as soil and water pollutants?
- ▶ Does the program maintain a smoke-free environment on center grounds?
- ▶ Are outdoor premises cleaned daily and kept free of undesirable and hazardous materials and conditions?
- ▶ Is a fire extinguisher available that is easily accessible, and is there a service date on the fire extinguisher showing that it has been updated at least annually?
- ▶ Are an appropriate number of smoke detectors installed, and is there documentation showing the smoke detectors are tested regularly?
- ▶ Is adequate emergency lighting available in case of a power failure?
- ▶ If there is spraying of pesticides or herbicides, does the program ensure that no children are present during the spraying, and children do not return to the affected area until it is safe?
- ▶ Is all sewage and liquid waste disposed of properly?
- ▶ Are garbage and trash stored in a safe and sanitary manner?

CHS3.4



## Child Health & Safety Key Indicator #4—Healthy Practices and Routines

*The program establishes and maintains healthy practices and routines.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
4.1	Staff, volunteers, and children wash their hands with soap and running water.	1304.22(e)(1)(i) 1304.22(e)(1)(ii) 1304.22(e)(1)(iii) 1304.22(e)(1)(iv)
4.2	Spilled bodily fluids are cleaned up and disinfected immediately according to professionally established guidelines.	1304.22(e)(3) 1304.22(e)(4)
4.3	The program adopts sanitation and hygiene practices for diapering that adequately protect children’s and staff’s health and safety.	1304.22(e)(5)
4.4	The program: <ul style="list-style-type: none"> <li>• Obtains information from parents about their children’s health and safety needs</li> <li>• Identifies and plans for accommodations</li> <li>• Ensures that appropriate staff are informed and trained in accordance with the program’s confidentiality policy</li> </ul>	1304.22(b)(3)
4.5	The program’s Nutrition program is designed and implemented to meet the individual nutritional needs and feeding requirements of each child (including children with special dietary, medical, or disability needs).	1304.23(b)(1) 1304.23(b)(1)(vii)
4.6	The program ensures that facilities are available for proper refrigerated storage and handling of breast milk and formula. <i>Note: Applies only to programs serving infants and toddlers</i>	1304.23(e)(2)
4.7	Effective dental hygiene is promoted among children.	1304.23(b)(3)
4.8	The program ensures that medication is properly administered, stored, and labeled and is not accessible to children.	1304.22(c)(1) 1304.22(c)(2)
4.9	All infant and toddler toys are sanitized regularly. <i>Note: Applies only to programs serving infants and toddlers</i>	1304.53(b)(2)



## Targeted Questions

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### Safety Observation—Center-Based Classroom and FCC

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- ▶ If you observed any situation in which hand washing was necessary (e.g., after diapering or toilet use, before food preparation, whenever hands were contaminated with blood or other bodily fluids, and after handling pets or other animals), did volunteers, staff, and children wash their hands with soap and running water?

CHS4.1

## Targeted Questions

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### Safety Observation—Center-Based Classroom and FCC

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- ▶ If you observed staff coming into contact with spills of bodily fluids (e.g., urine, feces, blood, saliva, nasal discharge, eye discharge, or any other fluid discharge), were nonporous (e.g., latex) gloves worn by staff? Also, was the spill cleaned up immediately and all exposed areas cleaned and sanitized?

CHS4.2

## Targeted Questions

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### Safety Observation—Center-Based Classroom and FCC

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- ▶ If you observed diapering during your observation, did staff practice proper sanitation and hygiene procedures for diapering?

CHS4.3

## Targeted Questions

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### Parent—Interview

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- ▶ Ask parents whether the program has asked them to provide information about their children's health and safety needs. If so, ask them to describe their experience sharing this information with the program. What type of information did they share?

CHS4.4



## Health Services Coordinator—Interview

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- ▶ Ask the Health Coordinator how the program accommodates each child’s individual health and safety needs.
  - Ask for examples of how the program shared information about individual health and safety needs with staff and parents.
  - Ask the Coordinator to provide examples of some of the accommodations that were needed.
  - Ask the Coordinator how staff are informed and trained regarding needed accommodations.

CHS4.4

## Targeted Questions

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### Nutrition Coordinator—Interview

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- ▶ Determine how the program:
  - Considers cultural and ethnic preferences when creating menus
  - Serves a variety of foods that broadens the children’s food experience
  - Meets the nutritional needs and feeding requirements of all children (including current USDA recommendations)
  - Addresses special dietary needs
  - Accommodates the feeding and nutritional needs of children with disabilities
  - Adjusts meal and snack times to meet the individual needs of all children
  - Feeds infants “on demand”

CHS4.5

## Targeted Questions

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### Safety Observation—Center-Based Classroom and FCC

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- ▶ Are facilities available for the proper storage and handling of breast milk and formula?

CHS4.6



## Targeted Questions

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### Safety Observation—Center-Based Classroom and FCC

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- ▶ Do children brush their teeth at least once per day in conjunction with meals?
- ▶ Do staff wipe the gums of infants after feeding?

CHS4.7

## Targeted Questions

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### Safety Observation—Center-Based Classroom and FCC

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- ▶ Are medications labeled and stored under lock and key and refrigerated if necessary?
- ▶ Are medications administered properly?

CHS4.8

## Targeted Questions

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### Safety Observation—Center-Based Classroom and FCC

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- ▶ Are infant/toddler toys clean and sanitized?

CHS4.9



## Child Health & Safety Key Indicator #5—Appropriate Group Sizes and Supervision

*The program ensures children’s safety through effective supervision and optimal learning environments by providing appropriate group sizes.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
5.1	<p>The program ensures it maintains appropriate class and group sizes based on the predominant age of the children.</p> <p><i>Note: If State, local, or Tribal regulations specify staff-to-child ratios and group sizes more stringent than the Head Start requirement, the State, local, or Tribal regulations must apply.</i></p> <p><i>Note: Applies to center-based programs serving preschool-age children Note: Applies to the Family Child Care program option</i></p>	<p>1306.20(g)(1)</p> <p>1306.20(g)(2)</p> <p>1306.32(a)(2)</p> <p>1306.32(a)(3)</p> <p>1306.32(a)(4)</p> <p>1306.32(a)(5)</p> <p>1306.32(a)(6)</p>
5.2	<p>The program ensures that no more than eight children are placed in an infant and toddler space, and no more than four children are assigned to each teacher.</p> <p><i>Note: If State, local, or Tribal regulations specify staff-to-child ratios and group sizes more stringent than the Head Start requirement, the State, local, or Tribal regulations must apply.</i></p> <p><i>Note: Applies only to center-based programs serving infants and toddlers</i></p>	<p>1304.52(g)(4)</p>
5.3	<p>The program arranges outdoor play areas at center-based programs to prevent children from getting into unsafe and/or unsupervised areas. The program also ensures that children en route to play areas are not exposed to vehicular traffic without supervision.</p> <p><i>Note: Applies only to programs with a center-based program option</i></p>	<p>1304.53(a)(9)</p>
5.4	<p>The program ensures children are released only to a parent, legal guardian, or other individuals as designated in writing by the parent or legal guardian.</p>	<p>1310.10(g)</p>
5.5	<p>No children are left alone or unsupervised while under the care of the program.</p>	<p>1304.52(i)(1)(iii)</p>



## Targeted Questions

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### Safety Observation—Center-Based Classroom and FCC

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Summary of Results for Appropriate Class and Group Size:

- ▶ What is the predominant age of children in the class at the time of the review?
- ▶ How many children are enrolled in the classroom?
- ▶ How many children are present in the classroom?
- ▶ What age group does the FCC Provider serve?
- ▶ How many children are present in the group?
- ▶ Is there an assistant present?
- ▶ How many children under 2 years of age are present?
- ▶ How many children under 18 months of age are present?

CHS5.1

## Targeted Questions

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### Safety Observation—Center-based Classroom

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Summary of Results for Staff to Child Ratios and Group Size

- ▶ How many infants/toddlers are present in the group?
- ▶ How many teachers are present in the group?

CHS5.2

## Targeted Questions

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### Safety Observation—Center

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- ▶ Are outdoor play areas arranged to prevent children from leaving the premises and getting into unsafe and unsupervised areas?
- ▶ Did you observe any instances in which children left an outdoor play area and were able to access unsafe or unsupervised areas or in which children en route to play areas at one or more centers were exposed to vehicular traffic without supervision?

CHS5.3



## Targeted Questions

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### Teacher—Interview

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- ▶ Ask staff to describe the process in place to ensure that children are released only to parents or legal guardians, and if children are released to another individual, the parent or guardian has provided permission in writing. Ask them how they ensure the contact information and roster they have are current.

CHS5.4

### Bus Driver- Interview

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- ▶ Ask the bus driver(s) to describe the process in place to ensure that children are released only to parents or legal guardians, and if children are released to another individual, the parent or guardian has provided permission in writing. Ask them how they ensure the contact information and roster they have are current.

CHS5.4

### Transportation Coordinator —Interview

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- ▶ With the Transportation Coordinator, review the program's procedures regarding the release of children and emergency contact with parents and guardians.
  - Where is this information kept?
  - What process is in place to keep this information and the roster up-to-date?

CHS5.4

## Targeted Questions

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### Transportation Coordinator, FCC Provider, Teacher or Assistant, Bus Driver —Interview

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- ▶ Ask staff to describe the process in place to ensure children are not left behind in a classroom or on a vehicle. Has a child ever been left behind? If yes, document the details and follow-up actions that were taken.

CHS5.5



## Child Health & Safety Key Indicator #6—Safe Transportation

*The program ensures children’s safety through effective and safe transportation.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
6.1	<p>The program’s vehicles are properly equipped.</p> <p><i>Note: Applies only to programs providing Transportation services</i></p>	<p>1310.10(d)(1) 1310.10(d)(2) 1310.10(d)(3) 1310.10(d)(4) 1310.12(a)</p>
6.2	<p>At least one bus monitor is aboard the vehicle at all times.</p> <p><i>Note: An approval letter from ACF is required for an exception to this regulation. Note: Applies only to programs providing Transportation services</i></p>	1310.15(c)
6.3	<p>Each bus monitor, before duty, has been trained on:</p> <ul style="list-style-type: none"> <li>• Child boarding-and-exiting procedures</li> <li>• Use of child restraint systems</li> <li>• Required paperwork</li> <li>• Emergency response and evacuation procedures</li> <li>• Use of special equipment</li> <li>• Child pick-up and release procedures</li> <li>• Pre- and post-trip vehicle checks</li> </ul> <p><i>Note: This requirement does not apply to programs with a waiver of this requirement approved by the Administration for Children and Families (ACF). An approval letter from ACF is required for exception to this regulation. Note: Applies only to programs providing Transportation services</i></p>	1310.17(f)(2)
6.4	<p>The program ensures that persons employed to drive vehicles receive the required behind-the-wheel and classroom training before transporting children.</p> <p><i>Note: This compliance measure applies to both directly employed and contracted bus drivers Note: Applies only to programs providing Transportation services</i></p>	<p>1310.17(b)(1) 1310.17(b)(2) 1310.17(b)(3) 1310.17(b)(4) 1310.17(b)(5) 1310.17(b)(6) 1310.17(b)(7)</p>
6.5	<p>The program provides reasonable assistance to families to arrange transportation to and from its activities. The specific types of transportation assistance offered are made clear to all prospective families in the program's recruitment announcements.</p>	1310.10(b)



## Targeted Questions

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### Bus Inspection

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Summary of Results for Bus Equipment:

- ▶ Is the bus equipped with a two-way communication system?
- ▶ Is the bus equipped with safety equipment for use in an emergency, including a charged fire extinguisher that is properly mounted near the driver's seat with a sign indicating its location?
- ▶ Is the bus equipped with a first aid kit and a sign indicating its location?
- ▶ Is the bus equipped with a seat belt cutter for use in an emergency evacuation and a sign indicating its location?
- ▶ Is the bus equipped for use of height- and weight-appropriate child restraint systems?
- ▶ Is the bus equipped with a reverse beeper?

CHS6.1

## Targeted Questions

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### Transportation Services Coordinator—Interview

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- ▶ Ask the Coordinator to describe the process for assigning bus monitors.
  - How many bus monitors are assigned to each route? What information is considered when making assignments?
  - How do bus monitors support the safe transportation of children with special needs? Are there times when more than one bus monitor is required? If yes, describe under what circumstances this might occur.

CHS6.2

## Targeted Questions

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### Transportation Services Coordinator—Interview

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- ▶ Review the program's documentation of training for bus monitors—including topics and date(s) training was received—with the Transportation Coordinator. Training topics should include:
  - Child boarding-and-exiting procedures
  - Use of child restraint systems (Note: lap belts are not appropriate.)
  - Required paperwork



- Emergency and evacuation procedures
- Use of special equipment
- Child pick-up and release procedures

Confirm that bus monitors are not scheduled for duty until required training is completed. If this is not the case, ask the Transportation Coordinator to describe why this occurred and document the date(s) of the training and the date(s) bus monitors were scheduled.

CHS6.3

## Targeted Questions

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### Transportation Services Coordinator—Interview

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- ▶ Ask the Transportation Coordinator to describe the training plan for staff employed to drive vehicles. Does the training include a combination of classroom and behind-the-wheel instruction sufficient to enable each driver to do all of the following?
  - Operate the vehicle in a safe and efficient manner
  - Safely run a fixed route, including loading and unloading children, stopping at railroad crossings, and performing other specialized driving maneuvers
  - Administer basic first aid in case of injury
  - Handle emergency situations, including vehicle-evacuation procedures
  - Operate any special equipment, such as wheelchair lifts, assistive devices, and special occupant restraints
  - Conduct routine maintenance and safety checks of the vehicle
  - Maintain accurate records as necessary

Ask the Transportation Coordinator when staff are scheduled to transport children relative to their training date(s).

CHS6.4

## Targeted Questions

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### Parent—Interview

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- ▶ Ask parents if they have trouble getting to the program. If they have had challenges, ask whether and how the program worked with them to overcome any transportation-related challenges to their children's attendance at program activities.

CHS6.5



## FCE Coordinator—Interview

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- ▶ With the Coordinator, review the program’s recruitment materials that describe the types of transportation assistance available to families. If necessary, are these materials translated into the preferred languages of prospective families to enable them to clearly understand the information?

CHS6.5



## Family & Community Engagement Introduction

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**Family and Community Engagement (FCE)** analyzes a Head Start program's family and community partnerships by examining the ways families are engaged in goal-setting, accessing services that meet their needs, and leadership opportunities that advance the overall design and implementation of the program. Head Start programs are responsible for facilitating and seeking the engagement of parents of participating children in activities designed to help parents become full partners in the education of their children, especially through family literacy services and parenting skills training that support the parent-child relationship. Programs are also responsible for engaging the community through local volunteerism and other activities that support the sustainability and reach of the Head Start program. By monitoring FCE, the Office of Head Start (the OHS) is better able to ensure that programs achieve the goals of engaging families and communities to support families and boost children's school readiness.

### Key Indicators of Program Performance

#### *Partnerships with Families*

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The program builds ongoing, respectful, and goal-oriented partnerships with families.

#### *Parent-Child Relationships*

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The program promotes positive parent-child relationships through parent education.

#### *Parents as Their Child's Educators*

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The program supports parents as their children's life-long educators.

#### *Parents in Transitions*

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The program engages families in the transition process.

#### *Community Partnerships*

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The program establishes community partnerships that support services to children and families.



## Family & Community Engagement

### Family & Community Engagement Key Indicator #1— Partnerships with Families

*The program builds ongoing, respectful, and goal-oriented partnerships with families.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
1.1	<p>Program staff engage in a process of collaborative partnership-building with all parents to:</p> <ul style="list-style-type: none"> <li>• Demonstrate respect for each family’s cultural, ethnic, and linguistic diversity</li> <li>• Establish mutual trust</li> <li>• Identify family goals</li> <li>• Identify strengths</li> <li>• Identify necessary services and other supports</li> </ul> <p>The process begins as early after enrollment as possible and must take into consideration each family’s readiness and willingness to participate.</p>	<p>1304.40(a)(1) 1304.40(a)(5)</p>
1.2	<p>The program works with families to provide referrals, resources, and services that are responsive to families’ needs and conducts follow-ups to determine the effectiveness of services received.</p>	<p>1304.40(b)(1) 1304.40(b)(2)</p>

### Targeted Questions

#### FCE Coordinator And FCE Staff—Interview

- ▶ Ask the FCE Coordinator and staff how they perform each of the following:
  - Demonstrate respect for each family’s cultural, ethnic, and linguistic diversity
  - Seek to establish mutual trust with parents
  - Help parents identify family goals, strengths, and necessary services and other supports
  - Begin the family partnership process as early after enrollment as possible

Document information regarding whether the partnership process takes place throughout the year and how the program tracks/documents staff attempts to engage families and family participation.

FCE1.1



## Parent—Interview

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- ▶ Ask parents to describe how the program provides them with opportunities to:
  - Share their culture, values, beliefs, and traditions with the program
  - Identify their strengths and needs
  - Create and implement individualized goals for their family
  - Identify services and supports needed to meet their goals

Ask parents how often staff talk with them about strengths, needs, and goals. Determine whether the program made a one-time effort to help the family set goals or whether the efforts have been ongoing.

FCE1.1

## Targeted Questions

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### FCE Coordinator And FCE Staff—Interview

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- ▶ Ask the FCE Coordinator and staff to describe how the program assists parents—either directly or through referrals—in obtaining resources and services that are responsive to their families' identified needs, goals, or interests.

Describe how the program determines whether referrals and/or resources met families' needs and what is done if the referrals and/or resources were ineffective.

- ▶ With the FCE Coordinator, review the documents used to track family services. Determine whether there is evidence of the program:
  - Working collaboratively with parents to identify and continually access services and resources
  - Following up with families to determine whether the kind, quality, and timeliness of services received through referrals met their expectations and circumstances

FCE1.2

## Parent—Interview

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- ▶ Ask parents how the program has assisted them—either directly or through referrals—in obtaining resources and services to meet their needs, goals, and interests.
- ▶ Ask parents to consider the services they described above. Ask whether they were satisfied and whether they felt the services met their needs and addressed their goals or interests.



## Family & Community Engagement Key Indicator #2—Parent-Child Relationships

*The program promotes positive parent-child relationships through parent education.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
2.1	<p>The program provides educational opportunities for parents to enhance their parenting skills that include:</p> <ul style="list-style-type: none"> <li>• Understanding the educational and developmental needs of their children</li> <li>• Sharing concerns and observations about their children with program staff</li> </ul>	<p>1304.40(e)(2) 1304.40(e)(3)</p>
2.2	<p>Program staff:</p> <ul style="list-style-type: none"> <li>• Educate parents about how to strengthen and nurture supportive environments and relationships in the home and at the program</li> <li>• Identify appropriate responses to children’s behaviors</li> <li>• Encourage parents to share concerns and observations about their children’s mental health</li> <li>• Share observations with parents regarding their children’s behavior and development</li> </ul>	<p>1304.24(a)(1)(i) 1304.24(a)(1)(ii) 1304.24(a)(1)(iii) 1304.24(a)(1)(iv)</p>
2.3	<p>The program makes provisions for mental health program services for parents and staff that include:</p> <ul style="list-style-type: none"> <li>• Staff and parent education on mental health issues</li> <li>• On-site mental health consultation with mental health professionals</li> <li>• Activities promoting children’s mental wellness</li> </ul>	<p>1304.24(a)(3)(ii)</p>

### Targeted Questions

#### Parent—Interview

- ▶ Ask parents to discuss the following:
  - What types of information have they received about their children’s developmental strengths or areas for growth
  - How they partner with staff in developing goals for their children
  - How the program shares information about their children’s progress
  - Whether they provided opportunities to share concerns about their children’s development
  - The information the program shared about how they, as parents, can help promote their children’s success as they get ready to enter school

FCE2.1



## Teacher, FCC Provider, Home Visitor—Interview

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- ▶ Ask the staff to describe how the program provides opportunities for developing parenting skills and knowledge in the following areas:
  - Expectant parenting and pre-natal health (as applicable)
  - Strategies to support their children’s development, including development of individual children’s goals and strategies for preparing their children for school
  - Ensuring the health and safety of their children
  - Providing input and sharing concerns regarding their children

FCE2.1

## Targeted Questions

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### ECD Coordinator—Interview

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- ▶ Ask the ECD Coordinator about the types of training and materials that are shared with parents. Collect information about how the mental health professional and/or staff:
  - Educate parents about how to strengthen and nurture supportive environments and relationships in the home and at the program
  - Identify appropriate responses to children’s behaviors
  - Encourage parents to share concerns and observations about their children’s mental health
  - Share observations with parents regarding their children’s behavior and development

FCE2.2

### Teacher, FCC Provider, Home Visitor—Interview

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- ▶ Ask how ECD Staff:
  - Share information, observations, and concerns about children’s behavior and mental health with parents
  - Seek parents’ input to clarify their understanding
  - Provide parents with opportunities to share their own observations and concerns

FCE2.2



## Targeted Questions

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### FCE Coordinator and FCE Staff- Interview

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- ▶ Ask the FCE Coordinator and staff to describe how they share information and educational resources regarding children’s mental health and wellness and whether they have access to the Mental Health Consultant.

Educational resources on mental health and wellness should be provided to groups and individuals as needed. Focus on the type and quality of services and information provided to individuals or groups of parents.

FCE2.3

### ECD Coordinator—Interview

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- ▶ Ask what types of educational resources related to mental health issues are provided by the program to staff and parents. Ask how the mental health professional is involved and whether consultation is provided on site.

FCE2.3



## Family & Community Engagement Key Indicator #3—Parents as Their Child’s Educators

*The program supports parents as their children’s life-long educators.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
3.1	The program encourages parents to be full partners in the education of their children; parents are invited to no fewer than two parent-teacher conferences and home visits per year.  <i>Note: Applies only to programs with a center-based program option</i>	1304.40(i)(2) 1304.40(e)(5)
3.2	The program increases families’ access to materials, services, and activities critical to family literacy development, including: <ul style="list-style-type: none"> <li>• Interactive literacy activities for parents and their children</li> <li>• Training for parents on how to be their children’s primary teachers</li> <li>• Education and resources that lead to economic self-sufficiency and financial literacy</li> </ul>	1304.40(e)(4)(i)
3.3	The program builds parents’ understanding of their rights under IDEA and builds their confidence in identifying, accessing, and advocating for resources needed to address their children’s special needs.  <i>Note: Applies only to programs serving preschool-age children</i>	1308.21(a)(6) 1308.21(a)(10)

### Targeted Questions

#### ECD Coordinator—Interview

- ▶ Ask the Coordinator to describe how home visits and parent-teacher conferences are conducted. Ask how the program ensures that all parents receive the required home visits and parent-teacher conferences.

FCE3.1

#### Parent—Interview

- ▶ Ask parents about parent-teacher conferences and teacher home visits, focusing on the scheduling of services and the information shared with the families.

FCE3.1



## Targeted Questions

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### Parent—Interview

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- ▶ Ask parents for examples of the different types of family literacy activities that are provided by the program. Ask them how the program helps them access literacy materials, services, and activities that engage the entire family. Listen for examples of the following:
  - Interactive literacy activities for parents and their children
  - Training for parents on how to be their children’s primary teachers
  - Education and resources that lead to economic self-sufficiency and financial literacy
  
- ▶ Ask parents for examples of the types of activities or strategies that the program uses to help support families’ financial stability and financial literacy. Ask whether the program provides relevant information and training, including activities that support knowledge about budgeting, financial resources, tax assistance, and access to benefit programs such as:
  - Tax credits, such as the EITC
  - Debt reduction
  - Benefits programs, such as TANF and SSI
  - Financial education classes
  - Individual development accounts (IDAs) supported by local programs that match families' savings
  - Help in setting up bank accounts for themselves and their children

FCE3.2

### FCE Coordinator And FCE Staff—Interview

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- ▶ Ask the FCE Coordinator and staff what opportunities the program has provided—either directly or through referrals—to both children and their families to increase their access to materials, services, and activities essential to supporting literacy development. Listen and probe to determine whether the program used any of the following approaches:
  - Interactive literacy activities for parents and their children
  - Training for parents on how to be their children’s primary teachers
  - Education and resources that lead to economic self-sufficiency and financial literacy

FCE3.2



## Targeted Questions

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### Disabilities Services Coordinator—Interview

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- ▶ Ask the Coordinator to describe how the program:
  - Informs parents of their rights under IDEA
  - Engages parents in activities or communication aimed at building their self-confidence, skills, and knowledge in identifying, accessing, and advocating for resources
  - Informs parents regarding advocacy strategies aimed at ensuring that the special needs of their children are met

FCE3.3

### Parent—Interview

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- ▶ Ask parents of children with identified disabilities:
  - Do you understand your rights under IDEA?
  - How confident are you in your ability to identify, access, and advocate for resources for your child?

FCE3.3



## Family & Community Engagement Key Indicator #4—Parents in Transitions

*The program engages families in the transition process.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
4.1	<p>The program supports successful transitions for enrolled children and families, both into and out of Early Head Start and Head Start programs, by:</p> <ul style="list-style-type: none"> <li>• Ensuring each child’s relevant records are transferred to the child’s next school or placement</li> <li>• Building relationships with principals, teachers, social workers, and health staff to facilitate continuity of programming</li> <li>• Discussing the developmental progress of individual students with parents and future teachers</li> <li>• Initiating joint transition-related training for staff</li> </ul>	<p>1304.40(h)(1) 1304.40(h)(3) 1304.41(c)(1)</p>
4.2	<p>The program initiates transition planning for each Early Head Start-enrolled child at least 6 months prior to the child’s third birthday to ensure the most appropriate placement.</p> <p><i>Note: Applies only to programs serving infants and toddlers</i></p>	<p>1304.41(c)(2)</p>

### Targeted Questions

#### Parent—Interview

► Ask parents:

- How has the program helped you plan for entering Head Start or Early Head Start or leaving to go to Head Start or another school?
- How did the program encourage you to get involved with your child’s education and development?
- How did the program help you coordinate transferring to a new placement?
- Did you have an opportunity to speak with new teachers, principals, or other staff?

FCE4.1

#### FCE Coordinator And FCE Staff—Interview

► Ask FCE Coordinator and staff to answer the following:

- What procedures are used to support successful transitions? What agreements does the program have with community partners to assist in transitions (the Coordinator, LEAs and individual schools)?



- What types of education and training are provided to parents to prepare them to exercise their rights and responsibilities concerning the education of their children in the school setting?
- How are parents assisted in communicating with teachers and other school personnel (or staff in new early care and education programs, such as childcare centers) so the parents can participate in decisions related to their children's education?

FCE4.1

## Targeted Questions

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### Teacher, Home Visitor, FCC Provider—Interview

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- ▶ Ask how the following procedures are taken into account during transition planning for children enrolled in EHS:
  - Begin at least 6 months prior to each child's third birthday
  - Assess each child's health status and developmental level
  - Determine the progress made by the child and family while in EHS
  - Determine the availability of Head Start and other child development or childcare services in the community
  - Provide evidence that the program made a determination as to whether a child should remain in EHS for additional months until he or she can transition into Head Start or another program

FCE4.2.



## Family & Community Engagement Key Indicator #5— Community Partnerships

*The program establishes community partnerships that support services to children and families.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
5.1	The program has established and maintains a Health Services Advisory Committee (HSAC).	1304.41(b)
5.2	The program promotes access to community services by establishing ongoing collaborative relationships with the following types of community organizations that are responsive to community needs: <ul style="list-style-type: none"> <li>• Health care providers</li> <li>• Mental Health providers</li> <li>• Nutritional services providers</li> <li>• Individuals and agencies that provide services to children with disabilities and their families</li> <li>• Family preservation and support services</li> <li>• Child Protective Services and any other agency to which abuse must be reported</li> <li>• Local elementary schools and other educational/cultural institutions (libraries, museums)</li> <li>• Providers of childcare services</li> <li>• Other organizations or businesses that may provide support and resources to families</li> </ul>	1304.41(a)(2)
5.3	The program coordinates with and has current Interagency Agreements in place with Local Education Agencies (LEAs) and other agencies (Part C) within the service area.	1304.41(a)(4) 1308.4(l)(3) 1308.4(l)(4) 1308.4(l)(5) 1308.4(l)(7)

### Targeted Questions

#### Health Services Coordinator—Interview

- ▶ Ask the Coordinator to describe the members of the HSAC and how individual members or the full committee provides support for program services. Determine whether the HSAC membership includes:
  - Head Start parents
  - Professionals
  - Other volunteers from the community

FCE5.1



## Targeted Questions

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### FCE Coordinator And FCE Staff—Interview

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- ▶ Ask the FCE Coordinator about the community partners he or she works with. Has the program developed partnerships with the following:
  - Health care providers
  - Mental Health providers
  - Nutritional services providers
  - Individuals and agencies that provide services to children with disabilities and their families
  - Family preservation and support services
  - Child Protective Services and any other agency to which abuse must be reported
  - Local elementary schools and other educational/cultural institutions (libraries, museums)
  - Providers of childcare services
  - Other organizations or businesses that may provide support and resources to families
  
- ▶ Ask the FCE Coordinator to describe each of the following:
  - How these organizations are responsive to community needs
  - How these relationships promote access to services by children and families served by the program
  
- ▶ What the program does to develop and sustain relationships with organizational partners.

FCE5.2

## Targeted Questions

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### Disabilities Services Coordinator- Interview

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- ▶ Review the program's Interagency Agreements with all the LEAs and other agencies (including Part C agencies for programs serving infants and toddlers) within the grantee's service areas and determine whether each of the following subjects is addressed:
  - Referrals for evaluations, IEP/IFSP meetings, and placement decisions
  - Transitions
  - File- and resource sharing (school readiness goals and assessment information)
  - The current program year, with appropriate signatures and dates



- ▶ Ask the Coordinator for the number of Interagency Agreements needed to ensure services are provided for all children with disabilities throughout the service area.

When multiple districts exist, ask the Coordinator to describe the process for ensuring effective Interagency Agreements are developed and maintained.

If the program does not have formal agreements with some LEAs or Part C agencies, ask the Coordinator the following:

- Why agreements have not been made, with a description of efforts to date
- Whether the Regional Office has been formally notified, and the recommended next steps

FCE5.3



## Child Development and Education Introduction

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**Child Development and Education (CDE)** captures information on a program’s practices and systems to promote school readiness for all children enrolled in the program. Head Start programs are responsible for engaging in a process of creating school readiness goals that support all children’s development in the five essential domains described in the Head Start Child Development and Early Learning Framework, and as appropriate, align school readiness goals with expectations of State Early Learning guidelines and local school districts.

Processes should be in place to collect, analyze, and aggregate school readiness data to track individual child progress, in addition to the progress of the program’s overall school readiness goals. The curriculum implemented by the program should support the development of all children in each of the five essential domains and include strategies for individualizing for each child. By Monitoring Child Development and Education, the OHS is better able to ensure that Head Start programs are providing services necessary to promote the school readiness of all children.

### Key Indicators of Program Performance

#### *School Readiness*

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The program has developed a system for establishing, tracking, using, and reporting school readiness goals.

#### *Curriculum Selection and Implementation*

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The program selects and implements a curriculum that supports the five essential domains of school readiness.

#### *Individualizing*

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The program individualizes early childhood development services for children.

#### *Quality Teaching and Learning*

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The program promotes quality teaching and learning for all program options.



## Child Development and Education

### Child Development & Education Key Indicator #1- School Readiness

*The program has developed a system for establishing, tracking, and reporting school readiness goals.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
1.1	The program has engaged in a process to align its school readiness goals with the Head Start Child Development and Early Learning Framework, State Early Learning guidelines, and the requirements and expectations of the schools the children will attend to the extent that they apply to children participating in the Early Head Start or Head Start program and has consulted with the parents of children participating in the program.	1307.3(b)(1)(i) 1307.3(b)(1)(ii) 1307.3(b)(1)(iii)
1.2	<p>The program has a system and processes in place to do the following in order to track, use, and report progress on school readiness goals:</p> <p>Aggregate and Analyze the following:</p> <ul style="list-style-type: none"> <li>• Individual, ongoing child-level assessment data for all children birth to age 5</li> <li>• Child-level data at least three times a year using data from one or more valid and reliable assessment tools</li> <li>• For programs serving dual-language learners (DLLs):</li> <li>• Status and progress in acquiring the knowledge and skills described in the Head Start Child Development and Early Learning Framework (demonstrated in any language, including the child's home language) and toward learning English.</li> </ul> <p>In order to use school readiness data:</p> <ul style="list-style-type: none"> <li>• Combine input from parents and families with assessment data to determine each child's status and progress in the five essential domains</li> <li>• Individualize experiences, instructional strategies, and services to best support each child</li> <li>• In combination with other program data, determine progress towards meeting program goals</li> <li>• Assess the fidelity of implementation of the curriculum</li> <li>• Direct continuous improvement related to the effectiveness of curriculum, instruction, professional development, and program design or other program decisions based on the analysis of school readiness outcomes data</li> </ul> <p>Report Results</p> <ul style="list-style-type: none"> <li>• To inform parents and the community of the program's progress in achieving school readiness goals</li> </ul>	1307.3(b)(2)(i) 1307.3(b)(2)(ii)



*Note: Programs in operation fewer than 90 days are required to have a system to aggregate and analyze data at least twice during their program operation period.*

## Targeted Questions

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### School Readiness Assessment—Interview with ECD Coordinator and Head Start Director

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- ▶ Ask the ECD Coordinator and Director to describe the program’s process for establishing school readiness goals for children enrolled in Head Start or Early Head Start. Your notes should describe how the program aligned school readiness goals with the following:
  - Head Start Child Development and Early Learning Framework
  - State Early Learning guidelines
  - Requirements and expectations of the schools the children will attend
- ▶ Please explain what alignment was not done, and why.
- ▶ Ask the ECD Coordinator and Director to describe how parents are involved in the process of developing the program’s school readiness goals.
- ▶ Review the program’s school readiness goals with the ECD Coordinator and Director. For each of the five essential developmental domains, document an example that shows how the program reflected the domain in its goals. If the program did not include one or more of the domains in its goals, describe why.

CDE1.1

## Targeted Questions

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### School Readiness Assessment: —Interview with ECD Coordinator and Head Start Director

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- ▶ How does the program aggregate and analyze individual, ongoing child-level assessment data for children birth to age 5 in all program options (e.g., home-based, center-based, FCC, EHS, and HS)?
- ▶ Does the program have a plan to complete the required aggregate data analyses?
- ▶ Ask the ECD Coordinator and Director to describe how the information gathered from the aggregated data analysis helps the program assess progress toward achieving school readiness goals. (Ask them to provide specific examples, and document them in your notes.)
- ▶ Ask the ECD Coordinator and Director to describe how the program makes improvements in the following areas based on its analysis of school readiness outcomes: (Ask them to include examples, and document them in your notes.)



- Curriculum and instruction
  - Professional development
  - Program design
  - Other program decisions
- ▶ Describe how the program supports dual-language learners in making progress toward school readiness goals and learning English.
- ▶ Describe how the program informs parents and the community of its progress in achieving school readiness goals

CDE1.2

### Teacher, Home Visitor, and FCC Provider – Interview

- ▶ Ask ECD staff to describe how they do the following. (Ask for specific examples, and document them in your notes.):
- Use ongoing child-level assessment data to identify children’s levels of development
  - Provide experiences to support children’s development
  - Monitor children's progress throughout the program year

CDE1.2



## Child Development & Education Key Indicator #2- Curriculum Selection and Implementation

*The program selects and implements a curriculum that supports the five essential domains of school readiness.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
2.1	The program selects and implements a curriculum that is evidence-based and is linked to ongoing assessment, with developmental and learning goals and measurable objectives.	642(f)(3)(C)
2.2	The program implements a curriculum that promotes young children's school readiness in the developmental areas presented in the Head Start Child Outcomes Frameworks and, as appropriate, is aligned with State Early Learning standards.	642(f)(3)(E)

### Targeted Questions

#### ECD Coordinator—Interview

- ▶ List the curricula the program utilizes for each program option and age group.
- ▶ Ask the ECD Coordinator to indicate whether the selected curriculum/curricula:
  - Supports the evidence base for its selection by considering the program option and ages of the children served, as well as by addressing staff development and training
  - Is linked to ongoing assessment
  - Includes developmental and learning goals appropriate for the ages of children and program option
  - Includes measurable objectives
- ▶ Ask the ECD Coordinator to describe how he or she determines whether staff are implementing the curriculum as designed .

CDE2.1

### Targeted Questions

#### Teacher, Home Visitor, FCC Provider—Interview

- ▶ Ask ECD staff to cite specific examples of how the curriculum is used to support the development and progress of children in the five essential domains:



- Language and Literacy Development
- Cognition and General Knowledge
- Approaches to Learning
- Physical Development and Health
- Social and Emotional Development

- ▶ Which domain is not supported, and why?

CDE2.2

## CDE Observations

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### Child Development and Education Observation

- ▶ Did the setting reflect the implementation of curriculum experiences that promote Language and Literacy
- ▶ Did the setting reflect the implementation of curriculum experiences that promote Cognition and General Knowledge
- ▶ Did the setting reflect the implementation of curriculum experiences that promote Approaches to Learning
- ▶ Did the setting reflect the implementation of curriculum experiences that promote Physical Development and Health
- ▶ Did the setting reflect the implementation of curriculum experiences that promote Social and Emotional Development

CDE2.2



## Child Development & Education Key Indicator #3— Individualizing

*The program individualizes early childhood development services for children.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
3.1	<p>The program uses information from ongoing observations, and evaluations, as well as insight from parents to determine how best to respond to each child’s individual characteristics, strengths, and needs.</p> <p><i>Note: Screenings results used for referring children for future evaluation is captured in Child Health and Safety and does not apply to individualizing in CDE.</i></p>	1304.20(f)(1)
3.2	<p>Services provided to children with identified disabilities are designed to support the outcomes contained in their IEPs or IFSPs.</p>	1308.19(k) 1304.20(f)(2)(i) 1304.21(a)(1)(ii)
3.3	<p>The program designates a staff member or consultant to coordinate services for children with disabilities, including collaborating with other program coordinators (i.e., Education, Mental Health, and Nutrition) and staff.</p> <p><i>Note: Applies only to programs serving preschool-age children</i></p>	1308.6(d) 1308.18(a) 1308.18(b) 1308.20(a)
3.4	<p>The program has secured the services of a mental health professional including on-site consultation for program staff and families that provides for timely identification and interventions to address children’s mental health concerns.</p>	1304.24(a)(3)(i) 1304.24(a)(2)
3.5	<p>The program’s approach to Child Development and Education (CDE) is developmentally and linguistically appropriate and demonstrates an understanding that children have individual rates of development, interests, temperaments, languages, cultural backgrounds, and learning styles.</p>	1304.21(a)(1)(i)

### Targeted Questions

#### Teacher, Home Visitor, FCC Provider—Interview

- ▶ Ask ECD staff to discuss how they use information to develop goals and plan experiences that respond to each child’s individual characteristics, strengths, and needs.

Ensure the following are included when individualizing for children:

- Ongoing observations



- Ongoing assessments of progress
- Insights from each child's family

#### CDE3.1

### Targeted Questions

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#### Teacher, Home Visitor, FCC Provider, Disabilities Coordinator—Interview

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- ▶ Ask staff to describe:
  - How they modify the program and arrange for the provision of related services (as required in the IEP or IFSP) for all children with disabilities
  - The resources available to them to support goals and services included in the IEPs/IFSPs
  - How they collaborate with LEAs and Part C agencies

#### CDE3.2

### Targeted Questions

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#### Disabilities Services Coordinator—Interview

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- ▶ Ask the Disabilities Coordinator—and describe in your notes—how he or she does the following:
  - Collaborates with the ECD Coordinator to include information from ongoing developmental assessments for children with disabilities in diagnostic and program-planning activities
  - Works with the Health Coordinator in the assessment and follow-up processes
  - Works with the Mental Health Coordinator to help teachers identify children who show signs of problems, such as possible depression, withdrawal, anxiety or abuse
  - Works with the Nutrition Coordinator and food-preparation staff to ensure that provisions to meet special needs are incorporated into the Nutrition program

#### CDE3.3



## Targeted Questions

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### Mental Health Services Coordinator—Interview

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- ▶ Ask the Mental Health Coordinator to describe how the program uses the services of the mental health professional to identify and provide interventions to address mental health concerns and how frequently these consultations occur.
- ▶ Determine the role of the Mental Health Consultant and the type of services he or she provides to the program. Describe how the Coordinator and Consultant are involved in the design and implementation of program practices.
- ▶ If applicable, review the mental health professional's Consulting Agreement with the Mental Health Coordinator to determine the types of services for which the professional is responsible and the frequency with which he or she visits the program. If there are discrepancies between the content of the Consulting Agreement and the results of the interview, describe the discrepancies and follow up as appropriate.

CDE3.4

## Targeted Questions

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### Teacher, Home Visitor and FCC Provider—Interview

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- ▶ Discuss the program's approach to CDE and how the program supports each child's individual growth, development and progress. Ask the ECD Staff to describe the following:
  - How they respond to individual interests, temperaments, languages, cultural backgrounds and learning styles
  - How they accommodate for the needs of dual language learners, both orally and in writing
  - How plans and outcomes are documented for all children

Ask them to share specific examples, and review curriculum-planning documents for children, as appropriate.

- ▶ Describe in detail how the program's approach to CDE does not support children's individual growth, development, and progress. Please include specific areas that were not supported.

CDE3.5



## Child Development & Education Key Indicator #4—Quality Teaching and Learning

*The program promotes quality teaching and learning for all program options.*

	<b>Compliance Measures</b>	<b>Federal Regulations</b>
4.1	The program hires teachers with the required qualifications, training, and experience.	645A(h)(1-2) 648A(a)(3)(B)(i) 648A(a)(3)(B)(ii) 648A(a)(3)(B)(iii)
4.2	The program ensures that Family Child Care Providers have the required qualifications, training, and experience.  <i>Note: Applies only to programs with a Family Child Care program option.</i>	1304.52(h)(1)
4.3	The program ensures that all full-time Head Start employees who provide direct Education services to children have professional development plans that are evaluated regularly to assess their impact on teacher and staff effectiveness.	648A(f)
4.4	The program ensures that home visitors have the required qualifications, training, and experience.  <i>Note: Applies only to programs with a home-based program option</i>	1304.52(e)
4.5	When the majority of children speak the same language, at least one classroom staff member or home visitor interacting regularly with the children speaks their language.	1304.52(g)(2)
	<b>Teacher-Child Interactions</b>	<b>Assessment Tool</b>
4.6	Emotional Support™ <ul style="list-style-type: none"> <li>• Positive Climate</li> <li>• Negative Climate</li> <li>• Teacher Sensitivity</li> <li>• Regard for Student Perspectives</li> </ul> <i>Note: Applies only to programs with preschool classroom options</i>	CLASS™
4.7	Classroom Organization™ <ul style="list-style-type: none"> <li>• Behavior Management</li> <li>• Productivity</li> <li>• Instructional Learning Formats</li> </ul> <i>Note: Applies only to programs with preschool classroom options</i>	CLASS™



4.8	<b>Instructional Support™</b> <ul style="list-style-type: none"> <li>• Concept Development</li> <li>• Quality of Feedback</li> <li>• Language Modeling</li> </ul> <p><i>Note: Applies only to programs with preschool classroom options</i></p>	CLASS™
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## Targeted Questions

### Teacher—Preschool—Staff File

#### Summary of Preschool Teacher Qualifications

- ▶ Please enter the qualifications of the preschool teacher:
  - A baccalaureate or advanced degree in Early Childhood Education (ECE)
  - A baccalaureate or advanced degree and coursework equivalent to a major relating to ECE, with experience teaching preschool-age children
  - An associate's degree in ECE
  - An associate's degree in a related field and coursework equivalent to a major relating to ECE, with experience teaching preschool-age children
  - A baccalaureate degree and admission into the Teach For America program, passing a rigorous Early Childhood content examination such as Praxis II, teaching preschool children in a Teach For America summer training institute, and receiving ongoing professional development and support from Teach For America's professional staff
  - Does not meet the qualifications

CDE4.1

### Teacher—Infant/Toddler—Staff File

#### Summary of Infant/Toddler Teacher Qualifications:

- ▶ Please enter the qualifications of the preschool teacher:
  - A minimum of a current Child Development Associate (CDA) credential and have been trained (or have equivalent coursework) in early childhood development with a focus on infant and toddler development
  - Does not meet qualifications

CDE4.1



## Targeted Questions

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### FCC Provider—Staff File

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► Summary of FCC Provider Qualifications:

- Previous ECE experience, current CDA
- Previous ECE experience, enrolled in CDA program (within 6 months of beginning service provision)
- Previous ECE experience and associate's degree in Child Development or ECE (attained within 2 years of beginning service provision)
- Previous ECE experience and bachelor's degree in Child Development or ECE (attained within 2 years of beginning service provision)
- Previous ECE experience and enrolled in an associate's or bachelor's degree program in Child Development or ECE (within 6 months of beginning service provision)
- Does not meet qualifications

CDE4.2

## Targeted Questions

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### Teacher, Home Visitor, Teacher Aide- Staff File

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Summary of Results for Development and Evaluation of Professional Development Plans:

- Is there a professional development plan on file?
- Is the professional development plan designed to ensure attainment of qualifications or is the staff person currently enrolled in a degree program?

CDE4.3

### ECD Coordinator—Interview

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► Ask the coordinator to describe:

- How staff are involved in the development of their professional development plan
- How plans are evaluated to ensure that they have a positive impact on teacher and staff effectiveness
- How often professional development plans are evaluated
- How the program develops plans to ensure that teaching staff meet qualifications

CDE4.3



## Targeted Questions

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### ECD Coordinator—Interview

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- ▶ Review the documents the program uses to track and monitor home-visiting staff qualifications, training, and performance with the ECD Coordinator. Ask the Coordinator how the program confirms the knowledge and expertise of each home-visiting staff in the areas of:
  - Child Development and Early Childhood Education
  - Principles of child health, safety, and nutrition
  - Adult learning principles
  - Family dynamics
  - Accessing community resources and referring families to appropriate agencies and services

While reviewing documents with the Coordinator, determine the number of home visitors who have the required knowledge and expertise, and the number who do not. Document any home visitors who do not have knowledge and experience in any of the above areas.

Next, discuss with the Coordinator the process for evaluating the skills of home visitors. Does the process include assessing how the home visitors communicate with families and staff and how they motivate and engage families in program services?

CDE4.4

### Home Visitor—Interview

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- ▶ Ask the home visitors for specific examples of how they have attained, maintained, and implemented their knowledge, experience, and skills in the following areas:
  - Child Development and Early Childhood Education
    - Engage families in supporting their children’s growth and development
  - Principles of child health, safety, and nutrition
  - Adult learning principles
    - Respect and respond in ways appropriate to the culture, language, values, and structure of each family served
    - Facilitate social networks and group activities that support families’ strengths, interests, and needs
  - Family dynamics
    - Engage in respectful, goal-oriented partnerships with families to promote parent-child relationships and family well-being
    - Enhance parent-child relationships and support parents’ roles as the first and lifelong educators of their children



- Accessing community resources and referring families to appropriate agencies and services
  - ❑ Support families in using community resources that enhance family well-being and children’s learning and development
  - ❑ Act as a member of a comprehensive services team so that Family Services activities are coordinated and integrated throughout the program

Ask the home visitors to describe how they communicate with children and families, including the methods used. Provide specific examples.

CDE4.4

## Targeted Questions

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### ECD Coordinator—Interview

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- ▶ Ask the ECD Coordinator to describe the process used to:
  - Match the primary languages of children to the primary languages of the teachers
  - Ensure that staff can communicate with children and families who speak languages other than English

Review with the Coordinator the documentation the program uses to track the languages of program staff, children, and families. Determine the languages spoken by the majority of children in each setting and determine whether staff who speak the same languages are assigned to each setting.

CDE4.5